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ABSTRACT

The first in a series of publications addressing issues of linkage and coordination of job training programs in Texas, this paper focuses on the background of federal and state events requiring new strategies for coordination of job training programs in Texas and examines the nature and purpose of coordination of job training activities and related support services in Texas. In an outline of the development of manpower programs in Texas and the implementation of the Comprehensive Employment and Training Act (CETA), particular attention is paid to the State Employment and Training Council and the Advisory Council for Technical-Vocational Education in Texas. Described next are the historical perspectives for coordinating federally funded programs in Texas and the coordination mechanisms currently in operation in the state. The current extent of coordination of job training and related support services at the state and local levels is also examined. Suggestions are give for alternative ways of establishing an employment and training policy for Texas as well as for coordinating currently existing job training and support services in the state. (Other Education for Work Linkage Project reports are available separately--see note.) (MN)

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EDUCATION FOR WORK: EXTENT OF COORDINATION IN TEXAS

Linkage Series No. 1

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September 1981

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PREFACE

The Education-for-Work Linkage Project, sponsored by the Texas Department of Community Affairs, in cooperation with the Texas Engineering Experiment Station and Texas A&M University, College of Education, has an overall goal of studying and strengthening potential and actual linkages between job training systems and the private sector. Four purposes underlie all products of the project:

1. Developing a statewide information base for vocational education services provided in Texas.
2. Creating an information exchange network for program delivery agents.
3. Providing technical assistance and training to persons involved in vocational education services.
4. Providing policy research and program evaluation documents focusing on critical issues and concerns of the vocational education community.

This document is the first in a series of publications addressing issues of linkage and coordination of job training programs in Texas. Education for Work: Extent of Coordination in Texas, Linkage Series No. 1, focuses on the background of federal and state events that requires new strategies for coordination of job training programs in Texas. No attempts were made during the project year to measure coordination of job training with quantitative "yardsticks"; rather, the emphasis herein is on factors that currently exist at both the state and federal level that prevent coordination of job training programs. This document is an effort to identify the critical agencies and organizations involved in delivering job training and related support services and to examine the various networks that have been established in an effort to facilitate coordination of state and federal programs.

Information in this document was compiled from available literature, previous research and interviews with key planners in various state agencies. Both Eric Larson and I are appreciative of the courtesy and cooperation that was extended by various agencies interviewed, and especially the personnel associated with the Texas Department of Community Affairs: Mr. L. C. Harris, III, Mr. Armando Diaz, and Ms. Robin Roberts.

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PART I: INTRODUCTION

The responsibility for job training in Texas is currently shared by both federal- and state-funded program deliverers. Neither at the federal or state level, however, is there a centralized authority for making sure all citizens have access to job preparation activities at strategic times in their lives. Instead, job training is carried out by a wide array of program deliverers; and in many cases, job training is prompted by federal legislation, in cooperation with states.

The result is a patchwork, with various agencies assuming coordinating roles to address policy issues or to define overall policy regarding job training. Several agencies at both the federal and the state level address job-training-related goals, including quality of programs, cost-effectiveness of programs, and long-range planning, but no unifying mechanism exists through which these agencies may act in unison to plan, implement, and evaluate together the many job training and related programs that currently are being administered.

To the average citizen, job training can mean many different things. It can mean taking classes at night at a local community college to learn a new skill or to advance to a higher level of skill in a particular occupation. It can mean working toward a bachelor's or other degree at a college or university. It can mean taking classes at a proprietary school, such as a barber college, to qualify to engage in a particular occupational activity.

Likewise, to the professional administrator, job training also can mean many different things. It can mean using CETA funds to train hard-core unemployed persons in occupations in which they can earn their own living.

It can mean analyzing how local job training activities can be planned to meet local needs on a short-term basis, as well as for many years into the future. It can mean attempting to administer job training programs in a manner flexible enough to meet local needs, and at the same time conform to federal guidelines that spell out how federal funds for job training activities may or may not be used.

This paper represents an attempt to examine the nature and purpose of the concepts of coordinating job training programs, and related support services, in Texas. As job training programs were created by Congress, efforts to coordinate these programs among state and federal agencies began. In some cases, this coordination was required by law; in other cases, it occurred as a function of administering a program or programs.

As the summary on the following page demonstrates, federally funded work and training programs was a $15 billion-a-year activity during the 1979 fiscal year. The federal outlays depicted in this summary do not reflect the further complexity of this system as these funds travel from the federal to state, and, finally, to the local level where they are finally expended.

Because of the obvious complexity of this system, any study or examination of it must be carefully defined. To these ends, this document has been written in several different sections in order to attempt to meaningfully depict the activities involved in coordination of job training programs and related support services in Texas.

Efforts to coordinate federally funded projects in states preceded efforts to coordinate job training programs, and it is within this context that job training programs have been required to operate. A discussion of the history of these efforts in Texas has been included in this document

FEDERAL OUTLAYS AND OBLIGATIONS FOR WORK AND TRAINING PROGRAMS, BY AGENCY AND PROGRAM, FISCAL YEAR 1979, ($ IN MILLIONS)

Agency and Program	Obligations	Outlays
TOTAL, ALL AGENCIES	$15,257.6	$14,452.5
Department of Agriculture		
Youth Conservation Corps	60.0	62.7
Department of Commerce		
Job Opportunities Program	0.0	2.0
Department of Health and Human Services		
Social Services Training and Employment	223.0	223.0
HHS Vocational Rehabilitation	1,018.8	965.9
Subtotal, HHS	1,241.8	1,188.9
Department of the Interior		
Indian On-the-Job Training	1.2	1.2
Indian Institutional Training	17.6	17.6
Indian Direct Placement	14.2	14.2
Indian Action Teams	22.4	22.4
Subtotal, Interior	55.4	55.4
Department of Justice		
Prisoner Training	5.0	1.9
Department of Labor		
Older Americans	220.6	207.8
Work Incentive (WIN) Program	380.1	385.0
Employment Service:		
ES Services	696.9	696.9
Food Stamp Recipient Placement	28.7	25.4
ESAP	22.7	22.7
Subtotal, ES	748.3	745.0
Employment and Training Assistance		
Title II - A,B,C	1,910.1	1,801.5
Title II - D	2,442.8	1,755.4
Indians	73.2	66.1
Migrants	91.8	90.2
Other National Programs	168.3	122.9
Program Support	57.5	46.5
Summer Youth Employment Program	622.2	659.5
Job Corps	400.8	379.6
Young Adult Conservation Corps	226.7	273.2
Youth Community Conservation and Improvement Projects	81.9	90.7
Youth Incentive Entitlement Pilot Projects	82.7	76.6
Youth Employment and Training Programs	427.3	480.1
Skill Training Improvement Program	34.0	136.5
HIRE	4.5	47.3
Migrant Initiative	0.1	16.2
Indian Initiative	2.1	15.6
Private Sector Program	32.6	3.7
Labor PRM	0.0	0.0
YCCIP R&D	11.5	12.7
YETP R&D	67.3	75.4
TJTC Administration	10.3	5.8
Welfare Reform Demonstration	23.5	2.4
CETA Outlay Shortfall	0.0	0.0
Subtotal, E and TA	6,811.2	6,157.9
Temporary Employment Assistance (Title VI)	3,317.2	3,285.2
Other DOL		
Antidiscrimination (ESA)	5.5	5.5
Labor Market Information (BLS)	36.9	36.2
Program Administration (ETA)	114.0	113.8
Contract Compliance (ESA)	41.5	39.5
Subtotal, Other DOL	197.9	194.5
Subtotal, Labor	11,675.3	10,975.4
Department of Education		
College Work Study	574.0	542.0
Vocational Education	682.9	680.7
Education PRM	0.0	0.0
Subtotal, Education	1,256.9	1,222.7
Department of Housing and Urban Development		
Community Development	30.0	20.4
Veterans Administration		
Veterans Skill Training	505.8	508.3
Veterans Assistance Centers	11.0	11.0
Veterans Vocational Rehabilitation	109.1	109.6
Subtotal, VA	625.9	628.9
Other Independent Agencies		
Equal Employment Opportunity Commission	105.6	92.5
Other Contract Compliance	0.0	0.0
Agency Federal Youth Programs:		
Summer Aides	36.2	36.2
Stay-in-School	92.8	92.8
Federal Summer Employment	72.7	72.7
Subtotal, AFYP	201.7	201.7
Subtotal, OIA	307.3	294.2

SOURCE: National Commission for Employment Policy Sixth Annual Report to the President and Congress, Washington, D.C.: The Commission, December 1980, p. 138-139.

to establish the context through which criteria for judging the effectiveness of coordination can be established, and for making recommendations for improving the overall nature of delivering job training services to Texas citizens.

Part II of this document outlines the development of manpower programs in Texas and describes the implementation of CETA, paying particular attention to the two organizations designed to have an impact on the policy of employment and training and related support services in Texas. These organizations are the State Employment and Training Council (SETC) and the Advisory Council for Technical-Vocational Education in Texas (ACTVE).

Part III of this document establishes the historical perspectives for coordinating federally funded programs in Texas, and concludes with a description of the coordinative mechanisms currently in operation. Particular attention is paid to the development of State Planning Regions (also called Councils of Government, or COGs), the state and federal initiatives that created them, and the concept of Circular No. A-95 Review. The reason that Part III was written in this manner was to distinguish it from the set of mandates for the coordination of job training programs. The concept of coordinating federally funded programs predates these mandates, and a likely impression of persons dealing only with manpower programs could be that the mandates to coordinate manpower programs are "new."

Another useful reason for treating Part III separately from Part II is that it provides an opportunity for the elucidation of the legal basis for regional socioeconomic planning in Texas, using the 24 COGs established during the late 1960s. It is within such a regional context that successful planning of job training programs and related support services can take place.

Part IV of this document describes the current extent of coordination of job training and related support services at both the state and local level in Texas. The agencies participating in state level coordination are listed, as well as the local agencies. A brief discussion of the type of job training and/or related support service is included to identify the nature of each activity. One feature of Part IV is that it contains maps of the service areas used for planning and/or program service delivery by each agency that has been identified. By examining these service areas, it is possible to determine how program planning and administration does or does not follow the "regional" lines established by COGs. In a time of cutbacks of federal funds and states being forced to do more with less, an examination of how service areas could be realigned to reflect a more efficient mode of program planning and administration could prove useful. Coupled with the legal basis for regional planning that is outlined in Part III, a sound case for regional planning in Texas can be established.

Part V of this document is an attempt to summarize the issues that were discussed in each of the preceding sections, and to suggest alternative ways of establishing an employment and training policy for Texas, as well as suggestions for coordinating the many job training and support services that are currently being delivered to Texas citizens.

PART II: HISTORICAL DEVELOPMENT & PERSPECTIVE OF MANPOWER PROGRAMS IN TEXAS

Because of the variety of manpower programs and related support services, it is easy to confuse a program issue with a coordination issue; as noted previously, various social programs enacted since the 1930s have attempted to address job-related problems in many different ways, while the concept of coordination of these programs has existed only since the mid 1960s.

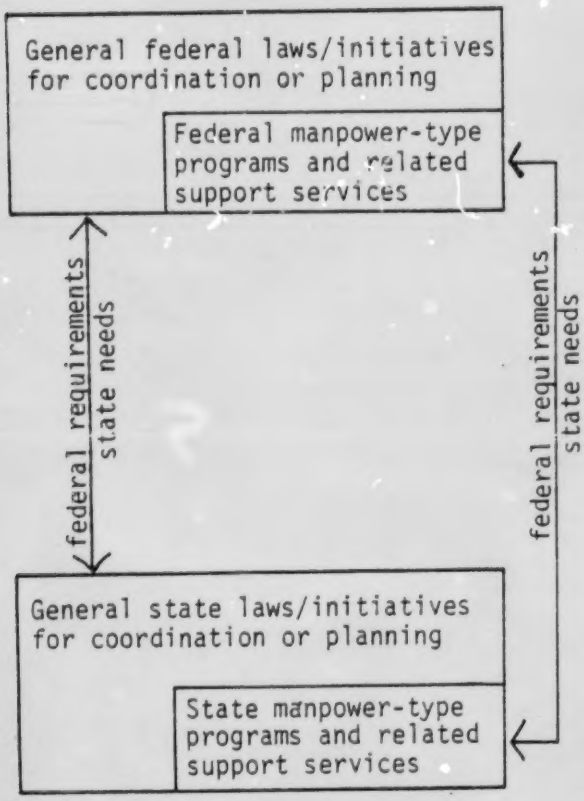
The laws which created these social programs, and which address the problems associated with coordinating these programs, have evolved from major philosphical changes in the way that the U.S. population and the U.S. government have perceived solutions to these problems. These changes are based upon a strategy of government -- or public -- intervention in the private economic marketplace to affect systems that prepare people for employment, and match the needs of potential employees with the needs of employers.

The laws and initiatives behind these strategies are virtually all federal. Because Congress traditionally allocates the actual delivery of human service programs to the administrative structures that exist in each of the 50 states, actual program administration style varies considerably; however, each program has this in common: it has to meet federal guidelines and rules in serving members of eligible population(s). The "new federalism" advocated by President Richard Nixon in the early 1970s was particularly aimed at taking administrative control of programs from the hands of administrators in Washington and placing it at the appropriate local level of government.

One way to conceptualize the general concept of both coordination and program activities is shown in Figure 1. The general federal laws/initiatives

FIGURE 1

INITIATIVES FOR COORDINATION AND PLANNING


General federal laws/initiatives for coordination or planning
Federal manpower-type programs and related support services
federal requirements
state needs
federal requirements
state needs
General state laws/initiatives for coordination or planning
State manpower-type programs and related support services

SOURCE: Compiled by staff of the Education-for-Work Linkage Project, Texas A&M University and Texas Engineering Experiment Station, College Station, Texas, August 1981.

for coordination or planning triggered, as will be demonstrated later, specific responses at the state level. Similarly, the creation of federal manpower-type programs and related support services triggered specific responses to these programs at the state level. The dichotomy of "federal requirements/state needs", as a result, began to create several sets of strategies; these include desires of the U.S. Congress to enact and carry out programs to meet social needs as expressed by citizens; desires of the various states to maximize the flow of federal dollars out of Washington to the states to help meet the goals enacted by Congress; and a desire on the part of both federal and state officials to carry out these programs efficiently. The obvious problems created by administrative "turf" in both federal and state agencies continue to plague administrators, and a solution has proven to be elusive.

The issue of coordinating manpower programs and related support services is a phenomenon of the 1970s, although federal and state efforts to coordinate federal and state programs emerged during the late 1960s. Prior to the 1970s, federal involvement in manpower programs was relatively minor, and consisted of funding relatively small programs under a system of categorical grants.

In examining the coordination issue, it is useful to examine how manpower programs evolved historically. Generally, these programs evolved out of U.S. government policies to adjust certain areas of the economy when imbalances were thought to be occurring; these changes in the way that the economy functioned may be traced to changes in the occupational structure of industry, characteristics of the labor force, and a shift from an agricultural to an industrial economy.

The typical worker, during the early history of this country, labored on a farm or was an industrial blue-collar worker. The Industrial Revolution, which began during the latter part of the 1880s, began to change the occupational structure of the U.S. labor force.

Because of these changes, stereotyping this typical worker became harder; and by 1970 he or she "was more often skilled or semi-skilled and was likely to be a white-collar worker in an office."[1] Employment problems of this labor force mirrored the complexity of the new industrial structure whose needs it served.

Congress viewed both education and help to needy people as state, rather that federal, responsibilities; and these problems were left to states to work out. Most states, however, thought of assistance to the needy as primarily a local responsibility. Local communities, then, were faced with trying to solve these problems. These attitudes, based on the historic experience of settling America, viewed the individual as responsible for his or her own success or failure.

It took the economic crisis of the Great Depression to change these ideas. From 1931 to 1940, unemployment rose to more than 14 percent; in 1933 alone, about 15 million persons were unemployed, a rate of more than 25 percent. Poverty became viewed as a significant economic problem which affected every American community; consequently, local, state, and, later, the federal government, had to face the reality of providing some ways to help their constituents.

In 1933, Congress set the stage for federal involvement in work-related issues by passing the Wagner-Peyser Act. This act established federally funded Employment Service (ES) offices in each state. In Texas, this organization is the Texas Employment Commission. The act created a national

system of employment offices to offer counseling, testing, and placement services free of charge to both job seekers and employers.

While the Wagner-Peyser Act, and other federal legislation designed to create public service jobs and other employment opportunities for people thrown out of work by the Great Depression, represented an effort to deal with these problems, it was not until World War II that the U.S. was able to bring the unemployment problem under control.

After World War II, several major events set the stage for further federal action in the manpower arena in the 1970s. These events included:

- Thousands of ex-soldiers using funds from the GI Bill to return to or begin a college education; this action had the general effect of raising the skill levels of the labor force.
- Increasing mechanization of agriculture, and a decrease in agricultural employment.
- An unprecedented "baby boom" that increased the number of workers entering jobs during the 1960s and 1970s.
- A lengthening of the average life span, a factor that ultimately added to the supply of skilled workers.
- More women entered the labor force, with the female labor force participation rate comprising approximately 42 percent of the total labor force by 1981.

A recession during 1957-58 caused the U.S. Senate to set up a special committee to examine ways to deal with unemployment problems. Recommendations of this committee led to enactment of the Manpower Development and Training Act (MDTA) of 1962. MDTA's original purpose was to retrain workers whose jobs had been eliminated by economic and technological changes. By 1963, concern over high rates of unemployment among youth prompted Congress to pass the Vocational Education Act that year; this act replaced the prior Smith-Hughes Act and expanded the number of vocational programs as well as focused on special populations of needy clients.

A concerted effort to attack the problem of poverty was at the heart of another federal effort during 1964 -- the Economic Opportunity Act (EOA), whose programs constituted the major part of President Johnson's War on Poverty. It was through EOA that such categorical programs as Operation Mainstream, Job Corps, Neighborhood Youth Corps (NYC), and Community Action Programs started to combat the problems of unemployment at the local level.

It should be noted that, during the 1960s, the federal government began to become more involved in the social service area formerly handled alone by state and local governments. State, city, and county leaders, as well as some federal officials, began to realize that by the mid 1960s there were so many programs at all the levels of government that only confusion and waste resulted. The first beginnings of efforts to coordinate federal and state programs, as will be discussed later, were not addressed at coordinating manpower programs.

The first identifiable strategy for coordinating manpower programs was citizen participation. The Wagner-Peyser Act, which created the Texas Employment Commission, and the Manpower Development and Training Act of 1962, both had an advisory committee requirement. None of the members chosen for these committees, however, were from the client community. In March 1967, the U.S. Department of Labor put together an interagency agreement with several federal agencies having related programs; this eventually became the Cooperative Area Manpower Planning System (CAMPS). As it was originally conceived and established, CAMPS was designed as a coordinating organization.

The many categorical programs established by the Economic Opportunity Act of 1964 were duplicative, and Congress, in response to this problem, amended the EOA in 1967 to try to consolidate these programmatic efforts, especially at the local level.

These early EOA programs emphasized educating people rather than increasing the number of jobs available to the unemployed. In 1971, however, this philosophy was reversed when Congress passed the Emergency Employment Act; this act provided "disadvantaged" workers with public service jobs by creating a massive, federally funded, public employment program.

But, problems connected with coordinating manpower programs were not adequately addressed by Congress until 1973, when it passed the Comprehensive Employment and Training Act (CETA).

The original MDTA program of 1962 mandated that on-the-job training (OJT) be the responsibility of the Department of Labor, and that classroom training be the responsiblity of the Department of Health, Education and Welfare (HEW). It was up to officials in each department of determine how to effectively coordinate these two services for the benefit of clients who needed both.

In an obvious effort to address the coordination issue, Congress repealed the 11-year-old MDTA, and combined portions of the 1964 Economic Opportunity Act into the Comprehensive Employment and Training Act of 1973.[2]

CETA represents an aggregate of programs. On one hand, the Act calls for coordination; and on the other, it establishes prime sponsors -- new, quasi-political, entities to coordinate manpower training programs at the local level. The CETA law of 1973 (PL 93-203) as amended by the Comprehensive Employment and Training Act Amendments of 1978 (PL 95-524) requires both specific and broad coordination of manpower training programs at the local level. CETA represented the first federal attempt at consolidating the array of manpower programs that had proliferated under several different administrations.

Under Title VII of the 1973 Act, Congress mandated the creation of the National Commission for Manpower Training. The legislative committee that created this law reported to congress that

> . . . in a field as broad as manpower policy the structure of government with its inevitable jurisdictional anomalies and bureaucratic concerns, as well as the institutional conflicts and rivalries encountered in both the public and private sectors, will not be remedied except for a long period of time and that we need some means of working around these obstacles towards the goal of a more coherent national manpower policy. We feel that the National Commission for Manpower Policy is a device well worth trying.[3]

In the same piece of legislation, Congress charged the newly created National Commission for Manpower Training with the responsibility of studying the issue of coordination, and reporting its findings to both the President and Congress. This mandate declared that

> The Commission is charged with the task of conducting a special coordination study of the utilization and interrelation of programs of manpower training with closely associated programs such as those conducted under the Wagner-Peyser Act, the work incentive programs under part C of Title IV of the Social Security Act, and others of similar nature' and to make a report of the findings to the President and the Congress no later than January 31, 1975.[4]

The Commission reported

> The fragmentation of this nation's manpower efforts originate in the authorizing legislation and extends through the delivery of service at the local level. A complex array of laws, agencies and levels of government are involved in attempting to improve the employability and economic well being of segments of our population. However, the fragmentation of basic policies, programs and administrative structures hinder the overall effectiveness of these efforts.[5]

The original CETA legislation of 1973, and its 1978 Amendments, emphasize "decentralization" by removing many of the limitations found in categorical programs. CETA prime sponsors are encouraged to link up with other human resource development programs carried out by the Texas Employment Commission, the Work Incentive Program (WIN), Aid to Families with Dependent Children (AFDC), the Texas Rehabilitation Commission, and the many other organizations

providing similar types of assistance.

The 1978 CETA reauthorization specifies that

> It is the purpose of this Act to provide job training and employment opportunities for economically disadvantaged, unemployed, or underemployed persons which will result in an increase in their earned income, and to assure that training and other services lead to maximum employment opportunities and enhance self-sufficiency by establishing a flexible, coordinated, and decentralized system of Federal, State, and local programs. It is further the purpose of this Act to provide for the maximum feasible coordination of plans, programs, and activities under this Act with economic development, community development, and related activities, such as vocational education, vocational rehabilitation, public assistance, self-employment training, and social service programs.

A number of responsibilities involving coordination are delegated to state governors as a condition for receiving CETA funds. Listed in Sec. 105 of Title I of the 1978 act, it is noted that

> Any State seeking financial assistance under this chapter shall submit a Governor's coordination and special services plan to the Secretary (of Labor).[6]

The contents of this plan are to include:

1) Coordinating all employment and training services provided by the State, by prime sponsors, by State education agencies and other institutions of vocational and higher education, State and local public assistance agencies, and by other providers of such services in the State;

2) Coordinating programs financed under the Wagner-Peyser Act (29 U.S.C. 49 et seq) and this chapter; including assisting in the negotiation of any agreements . . . between prime sponsors and State employment security agencies;

3) Assuring that comprehensive employment and training plans do not necessarily result in the duplication of services;

4) Assisting the Secretary (of Labor) in enforcing the requirements for Federal contractors and sub-contractors to list all suitable employment openings with local offices of the State employment service agencies and to take affirmative action . . .;

5) Assuring the promotion of prime sponsor planning that takes into account conditions prevailing in labor market areas covering more than one prime sponsor area, as well as related activities such as community development, economic development, vocational education, vocational rehabilitation, and social services;

6) Exchanging of information between States and prime sponsors with respect to State, interstate, and regional planning for economic development, human resource development, education, and other subjects relevant to employment and training planning;

7) Developing and providing to prime sponsors, with or without reimbursement and upon request, appropriate information and technical assistance to assist them in developing and implementing their programs;

8) Making available to prime sponsors information on a State and local area basis regarding economic, industrial, and labor market conditions;

9) Carrying out special model training and employment programs and related services, which may include programs for offenders . . .;

10) Providing financial assistance for special programs and services designed to meet the needs of rural areas outside major labor market areas;

11) Providing labor market and occupational information to prime sponsors and appropriate educational agencies and instutitions without reimbursement; and

12) Facilitating and fostering the activities of the State Occupational Information Coordinating Committee established pursuant to section 161(b)(2) of the Vocational Education Act of 1963, with special emphasis on the systematic use of occupational information for prime sponsor planning as well as assisting and encouraging the development and use of career outlook information for individuals who are receiving rehabilitation services, students in local schools, and individuals using the services of prime sponsors and local offices of State employment security agencies.[7]

While the Governor has the responsibility for coordinating the above activities to the satisfaction of the Secretary of Labor, the actual administration of CETA programs is carried out by prime sponsors. Prime sponsors are state and local government units -- cities, counties, and states.

There are six types of prime sponsors:

1. A unit of general local government with a population of 100,000 or more.

2. A combination of two or more units of local government, or a state adjoining with a unit or units of local government(s); at least one of the local government units in either consortium must have a population of 100,000.

3. A local unit of government unit or combination -- with a population below 100,000 -- which can serve a substantial portion of a functioning labor market or is a rural area with a high unemployment level.

4. A state or the part of the state not covered by any other prime sponsors. The state's jurisdiction is commonly referred to as "Balance of State."

5. Any unit of local government that has been a prime sponsor and is still capable of carrying out the act's programs but whose population has dropped below 100,000.

6. Existing Concentrated Employment Program grantees serving rural areas with high unemployment.[8]

Prime sponsors can provide services directly, but CETA legislation encourages using subcontractors to administer local activities.

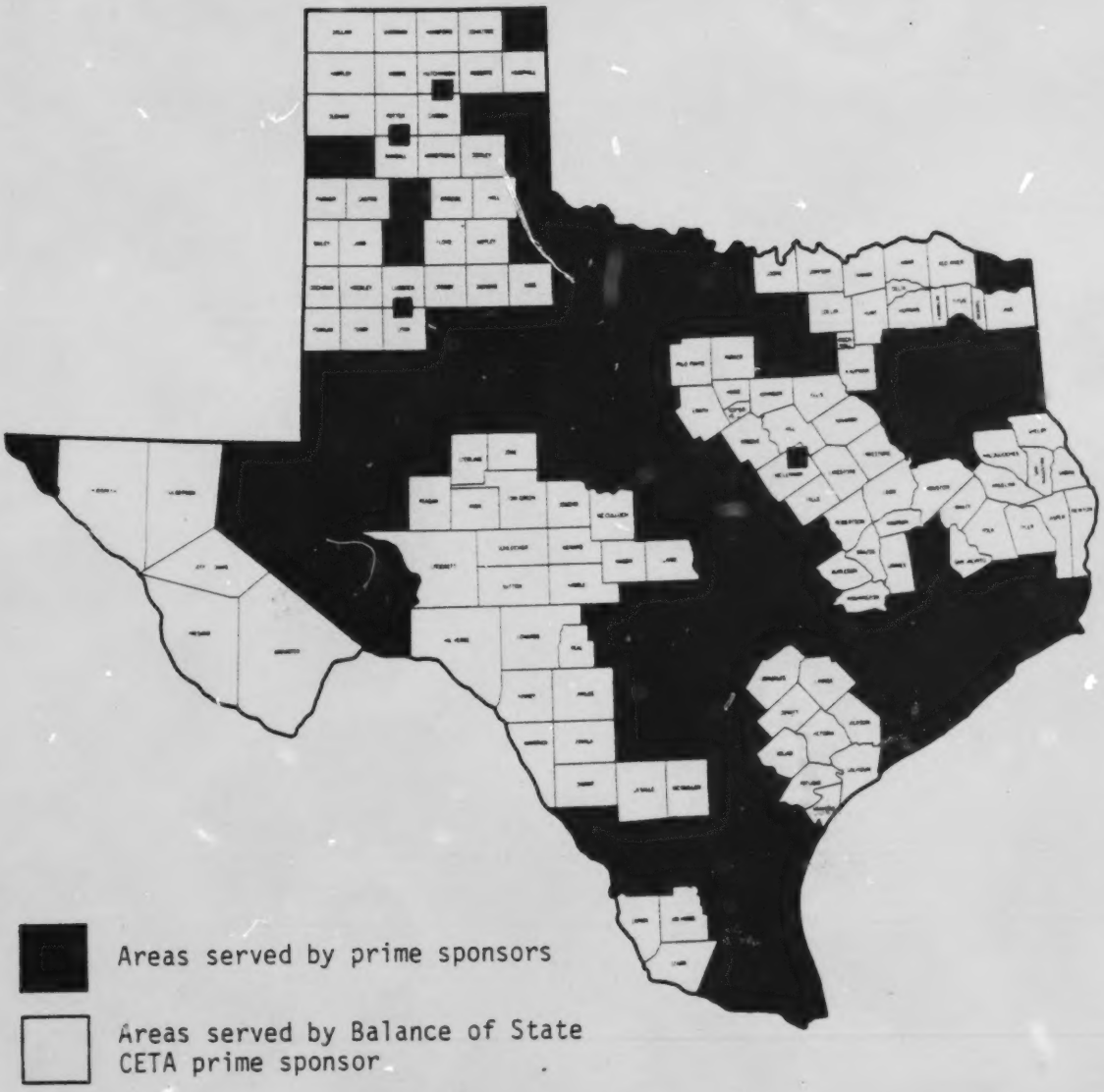
In addition to the prime sponsors created under Title I, there are other types of special prime sponsors that can be created under the provisions of Title III. These special types include Native American and Migrant Seasonal Farmworker CETA prime sponsors. The purpose of Title III is to establish the authority for special national programs designed to make services available to those whose needs may not be fully met by other CETA activities, and these programs are administered at the national level by the Department of Labor.

The impact of Title I has been to establish 27 new organizations in Texas as prime sponsors, including the state as a prime sponsor for areas not covered. The latter area is called the Balance of State (BOS).

Figure 2 illustrates the areas of Texas covered by prime sponsors and by the BOS prime sponsor.

FIGURE 2

CETA Prime Sponsor and BOS Service Areas



SOURCE: Texas Department of Community Affairs, Manpower Services Division, August 15, 1981, for the 1982 fiscal year.

The CETA law specifies that the Governor is responsible for serving eligible CETA participants in the BOS area; however, the Governor has delegated this responsbility to the Texas Department of Community Affairs (TDCA). Through its Manpower Services Division, TDCA contracts with local organizations for delivery of CETA services to eligible clients in the BOS area.

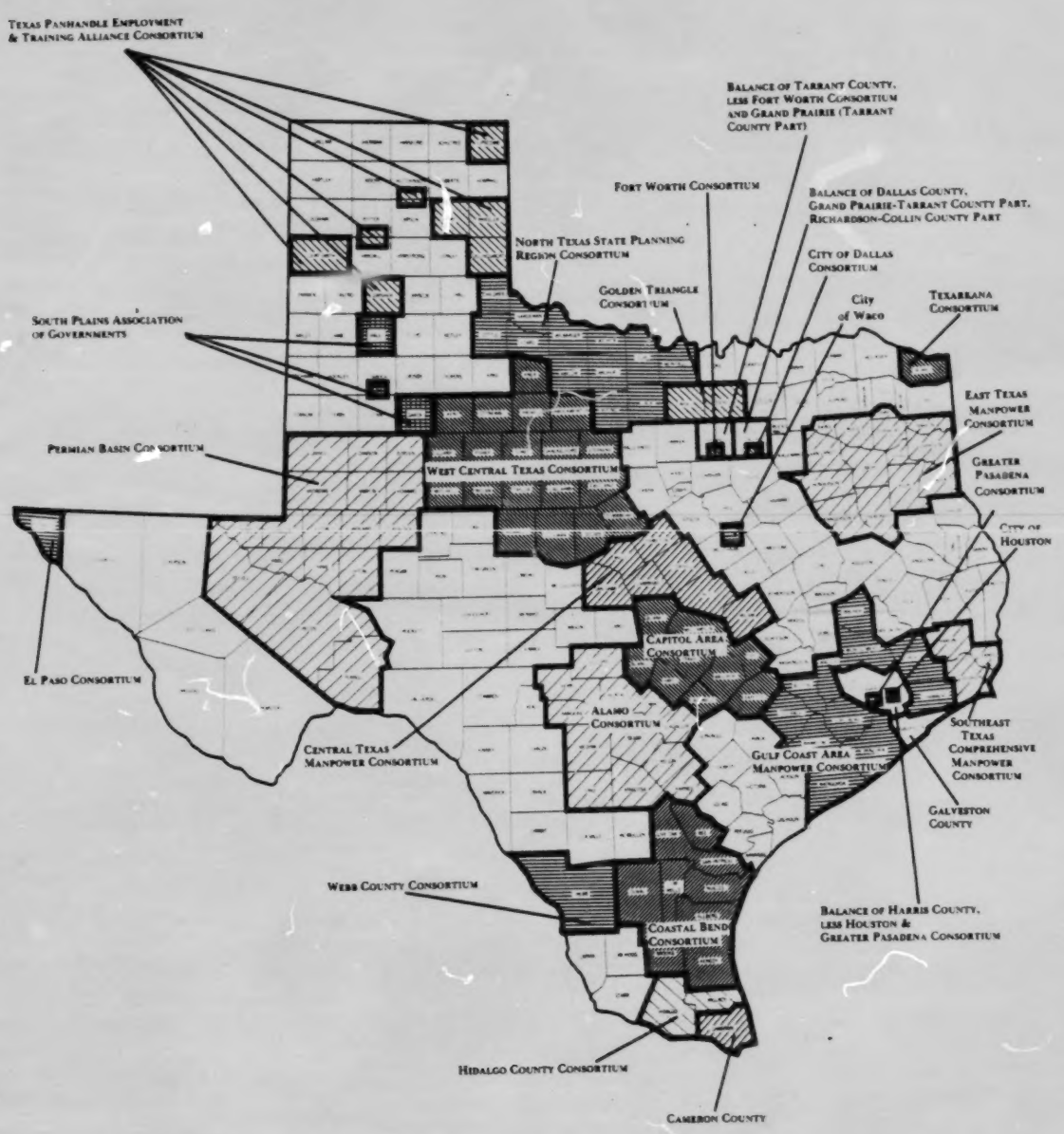
Figure 3 and Figure 4 depict, respectively, the areas served by CETA prime sponsors, and the area served by the BOS prime sponsor.

In addition to these prime sponsors, there are four additional special CETA prime sponsors that were created under provisions of Title III of the CETA law. These are three Native American prime sponsors which serve eligible Native Americans in Texas; and one Migrant Seasonal Farmworker prime sponsor which serves eligible Texas farmworkers and their dependents. The Native American prime sponsors have programs in defined service areas, as shown in Figures 5, 6, and 7. The Migrant Seasonal Farmworker prime sponsor serves eligible farmworkers statewide, and its service network is shown in Figure 8.

In summary, there are 27 CETA prime sponsors, including the BOS prime sponsor. The BOS prime sponsor, the Texas Department of Community Affairs, has divided the BOS area into 15 different regions, each served by a program contractor. The four special types of CETA prime sponsors created under Title III, the three Native American and one Migrant Seasonal Farmworker CETA prime sponsors, carry out their programs under the direct supervision of the U.S. Department of Labor, although their personnel work with other CETA prime sponsors or BOS program contractors in their areas.

FIGURE 3

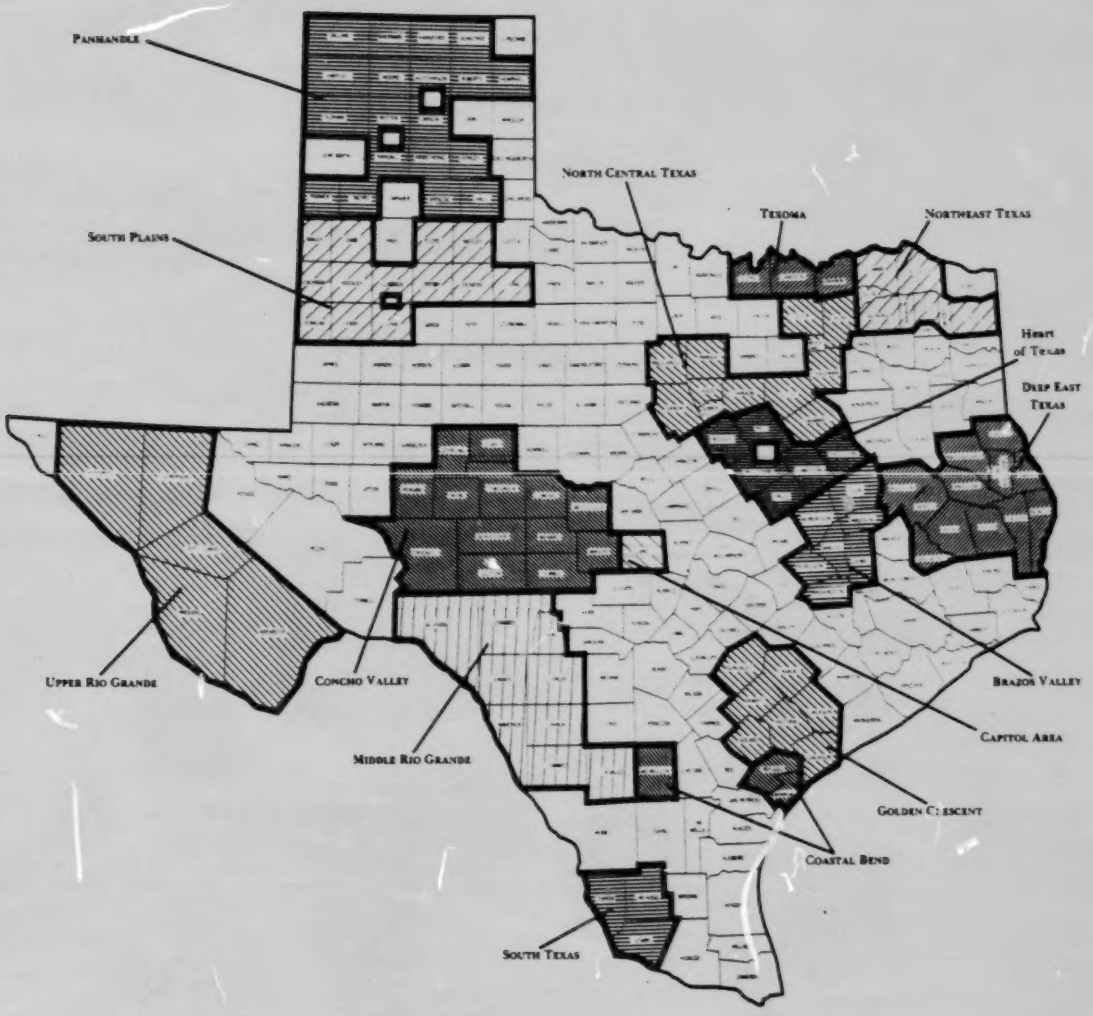
CETA Prime Sponsor Service Areas
(except Balance of State)


Texas Panhandle Employment & Training Alliance Consortium
Balance of Tarrant County, less Fort Worth Consortium and Grand Prairie (Tarrant County Part)
Fort Worth Consortium
Balance of Dallas County, Grand Prairie-Tarrant County Part, Richardson-Collin County Part
North Texas State Planning Region Consortium
City of Dallas Consortium
Golden Triangle Consortium
City of Waco
Texarkana Consortium
South Plains Association of Governments
East Texas Manpower Consortium
Permian Basin Consortium
West Central Texas Consortium
Greater Pasadena Consortium
City of Houston
Capitol Area Consortium
El Paso Consortium
Alamo Consortium
Central Texas Manpower Consortium
Gulf Coast Area Manpower Consortium
Southeast Texas Comprehensive Manpower Consortium
Galveston County
Webb County Consortium
Balance of Harris County, less Houston & Greater Pasadena Consortium
Coastal Bend Consortium
Hidalgo County Consortium
Cameron County

SOURCE: Texas Department of Community Affairs, Manpower Services Division, August 15, 1981, for the 1982 fiscal year.

FIGURE 4

Balance of State CETA Program Contractor Service Areas



SOURCE: Texas Department of Community Affairs, Manpower Services Division, August 15, 1981, for the 1982 fiscal year.

FIGURE 5

Tigua Indian Reservation Service Area
(CETA Title III Native American Prime Sponsor)

SOURCE: Tigua Indian Reservation, El Paso, Texas, June 1981.

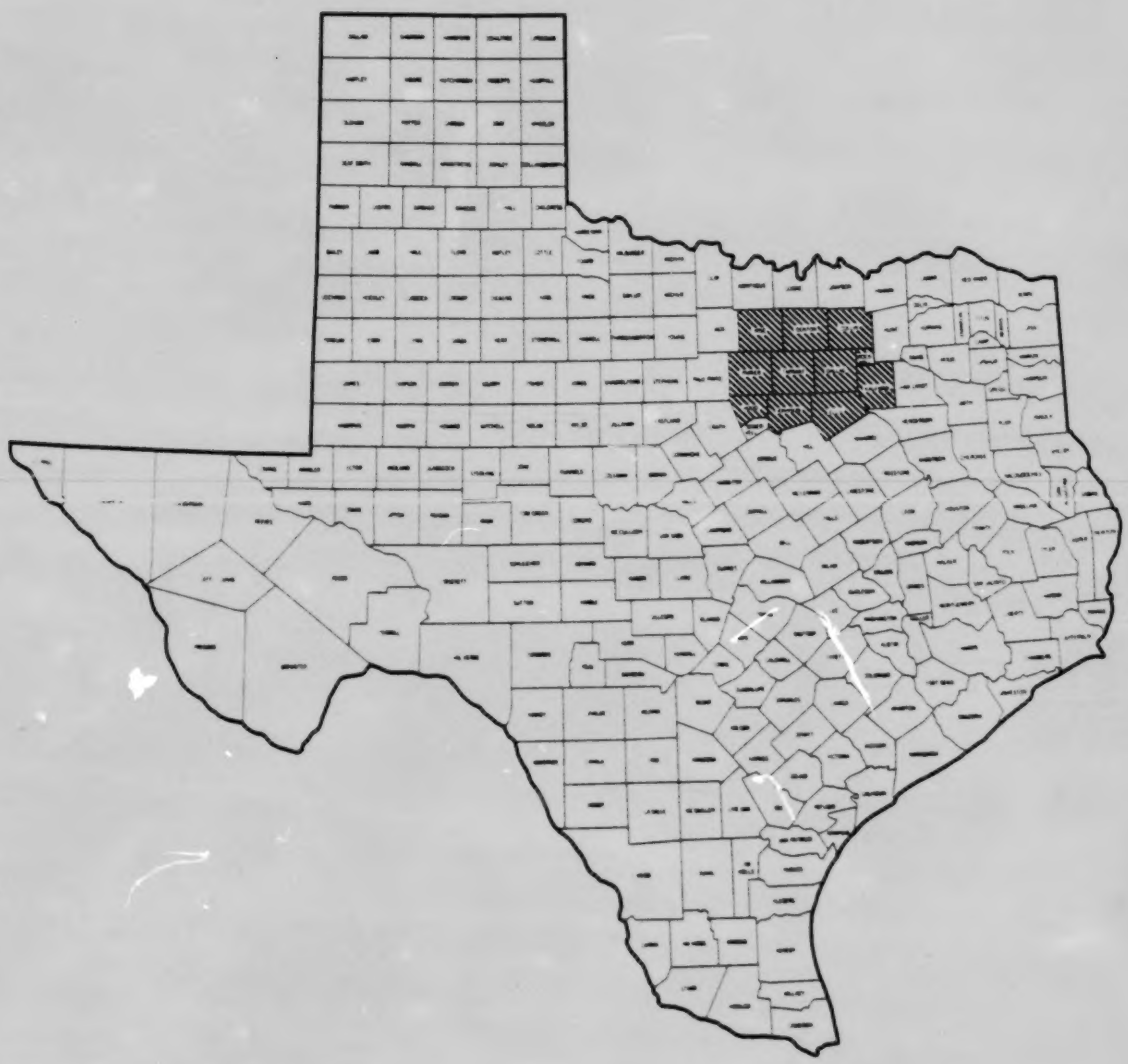
FIGURE 6

Alabama-Coushatta Indian Tribal Council Service Areas
(CETA Title III Native American Prime Sponsor)

SOURCE: Alabama-Coushatta Indian Tribal Council, Livingston, Texas, June 1981.

FIGURE 7

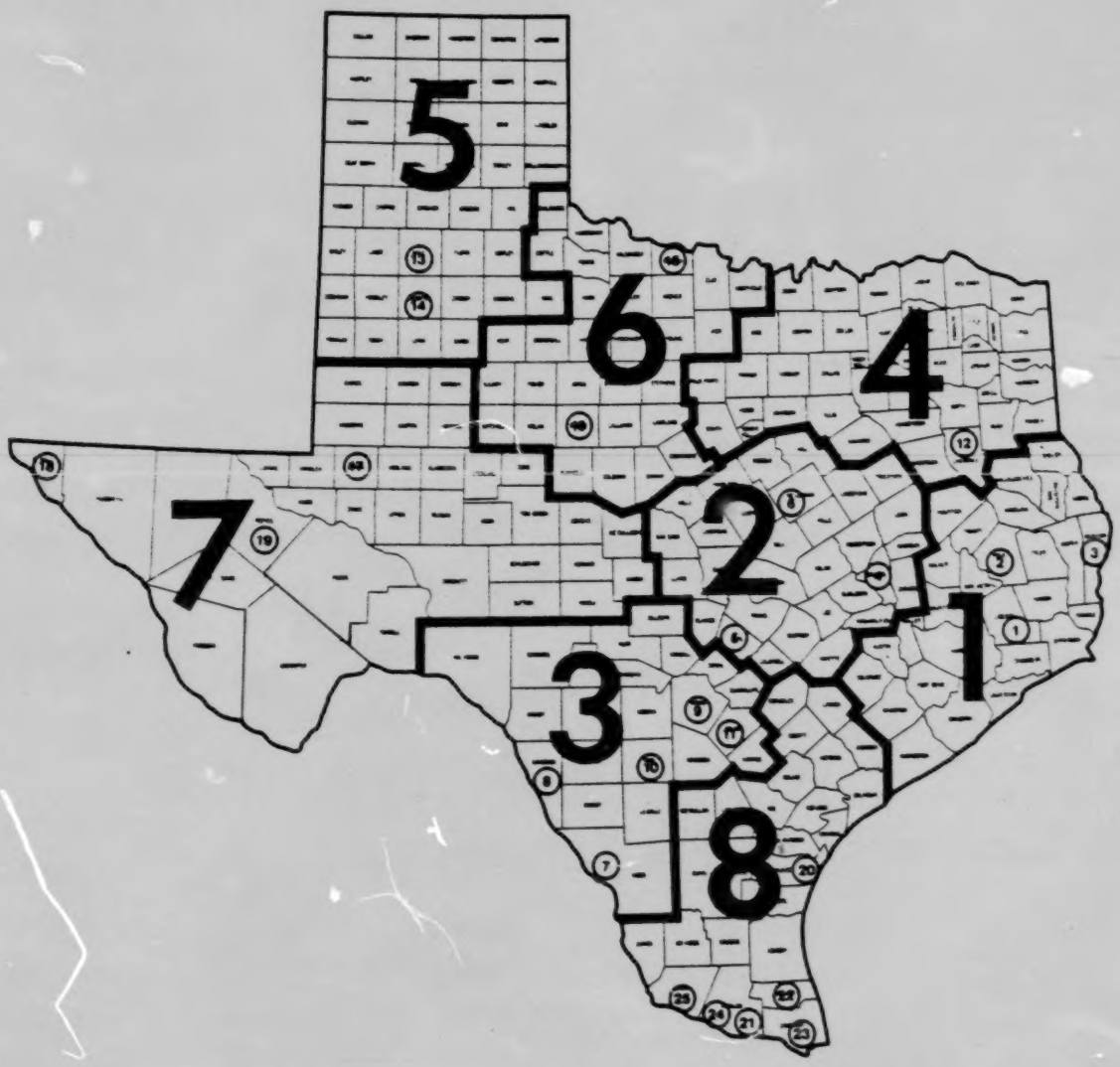
Dallas Inter-Tribal Center Service Areas
(CETA Title III Native American Prime Sponsor)



SOURCE: Dallas Inter-Tribal Center, Dallas, Texas, June 1981.

FIGURE 8

Motivation Education and Training, Inc. Service Areas
(CETA Title III Migrant Seasonal Farmworker Prime Sponsor)



SOURCE: Motivation Education and Training, Inc., Cleveland, Texas, June 1981.

Furthermore, in order for any state to receive CETA funds, it must establish a State Employment and Training Council (SETC); this provision is contained in Sec. 110 of Title I of the 1978 CETA law. This council has the responsibility of reviewing the plans of each prime sponsor (including Title III prime sponsors) and making recommendations to prime sponsors, the Governor, and the general public.

The SETC is composed of 24 members appointed by the Governor, and who represent units of local government, including those which are prime sponsors; representatives of organized labor, business and agriculture; and representatives from the CETA-eligible population.

Also, representatives from several agencies and organizations form a part of the Council membership. They are:

- State Advisory Council for Technical-Vocational Education
- Texas Education Agency
- Texas Employment Commission
- Community-based organizations
- Veterans' Organizations
- Organizations representing handicapped individuals
- Texas Department of Human Resources

As an independent advisory body, SETC's responsibilities include the continuous review of programs operated by each prime sponsor; review of plans developed by all state agencies providing employment, training and related services; and providing comments and recommendations to the Governor, the state agencies, and appropriate federal agencies on the relevancy and effectiveness of employment and training and related services systems in Texas.

SETC is mandated to cooperate with the State Advisory Council for Technical-Vocational Education (ACTVE). Working together, both councils identify the employment, training and vocational education needs of the state. They also assess the extent of assistance given to employment and training, vocational education, vocational rehabilitation, public assistance and other programs, representing a consistent, integrated, and coordinated approach to meeting such needs. Each council comments on the annual reports issued by the other.

The importance of the complementary relationship and coordination between the two councils has been outlined by SETC officials as follows:

1. The advent of the period emphasizing "linkage" and "coordination" comes as a result of a limitation placed on funding. Cost effectiveness makes collaboration between all state agencies providing employment and training services necessary.

2. Attention must be focused on the reauthorization of CETA in terms of when it will actually take place and what the points of impact will be. The time frame for innovation and new ideas relative to reauthorization will affect both councils.

SETC is a relatively new council, less than two years old. In this first stage, SETC has dealt with basic issues and much committee work. Committees meet with representatives from Private Industry Councils (PICs), and learn about the problems and the concerns of businesspersons. SETC staff also meet with prime sponsors regularly. Two members from SETC are also members of the ACTVE.

The 1980 federal mandate stipulates the following activities and functions for the SETC. The council shall:

- Review continuously the operation of programs conducted by prime sponsors in the state and the availability, responsiveness, and adequacy of state services provided by all employment-related agencies. The reviews conducted by SETC shall include an emphasis upon the following: statewide and inter-prime sponsor issues of utilization and coordination; employment and training resources of state agencies; and the coordination of plans and operations in contiguous areas. The review procedures must be publicized to all prime sponsors and affected state agencies prior to being implemented.

- Submit a public Annual Report to the Governor no later than February of each year, with copies to the State Advisory Council for Technical-Vocational Education and the Regional Administrator, and issue such studies, reports or documents to the Governor and prime sponsors as the SETC believes to be necessary to effectively carry out the Act. The Annual Report shall analyze the coordination of employment and training programs during the previous fiscal year, and recommend improvements. It shall also describe any special programs or linkages.

- Consult with the State Advisory Council for Technical-Vocational Education to identify employment, training, and vocational education needs of the state and to assess the extent of coordination among employment and training, vocational education, vocational rehabilitation, public assistance and other such programs.

- Comment at least once annually on the reports of the State Advisory Council for Technical-Vocational Education which shall incorporate such comments in the annual report it submits pursuant to Sec. 105 of the Vocational Education Act, as amended.

- Review proposed Comprehensive Employment and Training Plans and modifications of prime sponsors, and comment thereon, particularly with respect to non-utilization or duplication of existing services.

- Review plans of state agencies providing employment, training and related services. Provide comments and recommendations to the Governor, appropriate state agencies, prime sponsors, the general public and the appropriate federal agencies on the relevancy and effectiveness of employment, training, and related service delivery systems in the state and on means of improving effectiveness.

- Participate in the development of the Governor's coordination and special services plan.

- No later than May 15, to the maximum extent feasible, the council shall share with prime sponsors information on economic development, vocational rehabilitation, State Employment Security Agency activities, occupational demands and labor market demands.[9]

Finally, a "consultation" provision in Title I, Sec. 111, of the 1973 CETA law requires the Secretary of Labor to consult with the Secretary of

Health, Education and Welfare (this organization was split into the Departments of Education, and Health and Human Services in 1979) "with respect to arrangements for services of a health, education, or welfare character" under CETA.[10] Similarly, the latter departments must "solicit the advice and comments of appropriate State agencies with respects to health, education, and welfare services." These services are to include: basic or general education; educational programs conducted for offenders; institutional training; health care, child care, and other supportive services; and new careers and job restructuring in the health, education, and welfare professions.[11] The Secretary of Labor, in addition, "shall consult, as appropriate," with the Secretary of Commerce, the Secretary of Housing and Urban Development, the Secretary of Agriculture, the Director of the ACTION Agency, the Director of the Community Services Administration, the Administrator of Veterans Affairs, "and such other officials as appropriate" in carrying out or supporting CETA programs.[12]

Another advisory council, the Advisory Council for Technical-Vocational Education in Texas, forms a complementary relationship with the State Employment and Training Council. The Advisory Council for Technical-Vocational Education (ACTVE) exists to create an awareness of the successes and areas for improvement within the vocational education system, while the SETC, created under CETA's Title II, has been mandated to perform essentially the same evaluative service for CETA programs. These councils are linked together through federal legislation and perform a similar function for the state in reporting their perceptions about job training to the Governor.

The ACTVE is a citizens' advisory body with broad duties prescribed in detail by state and federal laws. The ACTVE was formed under provisions of the Vocational Education Amendments of 1968 (PL 90-756). It was formed

administratively in early 1969 and reconstituted September 1, 1969, under Chapter 31 of the Texas Education Code.[13]

The 24-member Council is recommended by the Governor, appointed by the State Board for Vocational Education, and confirmed by the Texas Senate. Members, who serve three-year staggered terms, represent such diverse areas as business, labor, local school boards, employment and training institutions, correctional institutions, students, minorities, women, agriculture, and the general public. Geographically, the members of the Council represent a widespread area of Texas.

One of the Council's duties is to report annually to the State Board for Vocational Education; and in 1973, the ACTVE was designated by the State Board to also serve as the State Advisory Committee for Adult Education.

ACTVE's general purpose is to "establish a climate conducive to the development of technical, vocational, and manpower training in education institutions in the State of Texas to meet the needs of industrial and economic development of the State."

The ACTVE has been federally mandated to evaluate vocational education programs, services and activities under the Annual Program Plan for vocational education. In accordance with this charge, the Council consults with the SETC on the following activities:

- Identifying vocational education and employment and training needs of the state.
- Assessing the extent that vocational education, employment and training, vocational rehabilitation, and other programs represent a consistent, integrated, and coordinated approach to meeting these needs.

According to ACTVE officials, ACTVE has had representatives from both the State Manpower Services Council, and its successor, the State Employment and Training Council (SETC), to consult with ACTVE on its reports and activities.

ACTVE officials felt this was "especially important" during the early years of CETA, which represented a new departure in creating prime sponsors.

In October 1980, a statewide conference was held by ACTVE, in conjunction with SETC, for leaders in business and industry within Texas. At the conference, business and industrial leaders expressed their concern about the growing demand for skilled workers, a problem which ACTVE officials feel that both vocational education and CETA must "aggressively address in this decade."

Most of ACTVE's activities and duties are handled via committee assignments which are supplemented with staff support. The Executive Committee serves as the primary unit responsible for implementing policies and directives of the Council: it is comprised of the current chairperson, vice-chairperson, and immediate past chairperson. This committee also advises the Executive Director on Council matters which do not require the attention of the full Council. In addition, there is a Steering Committee which is responsible for providing the overall direction to Council efforts. This committee reviews duties of the Council as mandated by state and federal legislation; reviews and assigns Council projects to appropriate commitees; and reviews committee guidelines and recommends needed changes. The remaining standing committees of the ACTVE include: the Planning and Evaluation Committee; the Industry/Education Committee; the Adult Education and Special Services Committee; and the Public Forum Committee.

The ACTVE is federally mandated to perform the following functions:

- Each state Advisory Council shall advise the state board in the development of the five-year state plan, the annual program plan and accountability report, and shall advise the state board on policy matters arising out of the administration of programs under such plans and reports.

- Each state Advisory Council shall evaluate vocational education programs, services, and activities assisted under the Vocational Education Act, and publish and distribute the results thereof.

- Each Council shall prepare and submit to the Commissioner and to the National Advisory Council an annual evaluation report, accompanied by such additional comments of the state board as the state board deems appropriate, which evaluates the effectiveness of vocational education programs, services, and activities carried out in the year under review.

- Each Advisory Council shall identify, after consultation with the SETC, the vocational education and employment and training needs of the state and assess the extent to which vocational education, employment training, vocational rehabilitation, and other programs assisted under this and related Acts represent a consistent, integrated, and coordinated approach to meeting such needs; and comment, at least once annually, on the report of the SETC, which comments shall be included in the annual report.

- Each Advisory Council is authorized to obtain the services of such professional, technical, and clerical personnel as may be necessary to enable it to carry out its functions under this Act and to contract for such services as may be necessary to carry out its evaluation functions, independent of programmatic and administrative control by other state boards, agencies, and individuals.

- In appointing the state Advisory Council, the Governor or the state board of education, as the case may be, shall insure that there is appropriate representation of both sexes, racial and ethnic minorities, and the various geographic regions of the state.

In ACTVE's report to the governor and members of the Texas Legislature, dated December 1980 and titled Directions for the '80s, recommendations were given for dealing with the variety of trends affecting Texas' economic growth and stability. These recommendations are:

1. Texas must look very closely at expanding its "industrial start-up training" capabilities to respond in a timely manner to the needs of new and expanding business and industry.

2. The state's adult education programs warrant an all-out commitment of tax dollars if Texas is to begin to scratch the surface in turning many out-of-school youth and adults from tax liabilities to taxpayers.

3. A strong message should be sent to Washington, D.C., that federal dollars for employment and training programs should be directed more toward "skills training" rather than government-subsidized jobs.

4. Career opportunities in the labor market should weigh more heavily on fiscal decisions affecting the types of educational programs offered in Texas. Three of every four jobs in Texas require some type of vocational or technical skills.

5. Efforts should be directed at providing every public school student with sequential career orientation and exploration experiences that will acquaint him or her with the work world, as a basis for making realistic career decisions. Efforts should also be directed at reaching parents, who have the greatest impact on career decision making.

6. Include concepts in basic education curriculum related to productivity, private enterprise, and worker attitudes. People must be exposed to these concepts while they are attending school.

The SETC and the ACTVE, then, are the major advisory bodies that are sanctioned at the state level in Texas to advise the Governor, members of the Texas Legislature, and federal officials, about the employment and training needs of the state of Texas.

While the federal government has, by design, a larger perspective on these issues, it is worth noting that it considers most job training programs a local responsibility. Too, the government has come to recognize that employment and training programs are also intimately related to other urban problems.

One recent strategy proposed by the federal government is to link job training programs with local economic development strategies and programs. In establishing the Interagency Working Group in Economic Development/Private Sector Jobs in 1978, President Jimmy Carter announced the following objectives, which were published in The President's National Urban Policy Report that year. These objectives were:

- improve local planning and management capability
- involve the state in urban areas
- stimulate greater involvement by neighborhood and voluntary organizations
- provide fiscal relief to hard-pressed communities

- provide incentives to attract private investment to distressed communities
- approach short-term unemployment with labor intensive public works
- attack long-term job shortages by rebuilding the private economic base of distressed communities
- increase access to opportunity for those disadvantaged by a history of discrimination
- expand social services
- improve the urban physical environment

The policy was an effort to establish partnerships between the private sector and public sector, and between various government agencies involved in urban areas.

To implement these objectives, President Carter established the Interagency Coordinating Council, to bring together "high level officials with direct program operating responsiblities to discuss needed improvements, examine specific local development plans, and resolve interagency conflicts."

With the exception of two strategies -- approaching short-term unemployment with labor intensive public works, and expanding social services -- the administration of President Ronald Reagan appears to remain committed to the other objectives. Current debate about giving funds to states in the form of block grants to carry out activities to meet local needs is an illustration that federal officials remain committed to the idea of local control over local matters and needs.

A policy committing the federal government to foster coordination between CETA programs and federal organizations is reflected in The President's Interagency Coordinating Council Employment Initiatives, which was published in April 1979. In this publication is set forth a copy of a Memorandum of Agreement between the following organizations: the Department of Labor, the Economic Development Administration; the Department of Housing and Urban

Development; the Department of Transportation; the Community Services Administration; and the Small Business Administration.

The Memorandum of Agreement specifically mandates these agencies to work together

> . . . to review their guidelines and regulations to remove obstacles to local coordination of their programs, and to undertake other activities, including information sharing, technical assistance and demonstration, at both the national and local levels, to promote programs and greater job creation (particularly private sector jobs) for urban residents, particularly the unemployed and economically disadvantaged . . . and to encourage the more coordinated use by local recipients of assistance provided under the Comprehensive Employment and Training Act Amendements of 1978.[14]

Further evidence that job training programs and economic development efforts are being viewed as related is reflected in the Department of Labor's Comprehensive Employment and Training Act Issuance No. 68-81, issued April 13, 1981. When CETA was reauthorized in 1978, the law specified that 10 percent of the funds available under its Title VII be set aside to provide incentive bonuses to prime sponsors/PICs that engage in economic development activities supported by federal, state, or local funds. According to this Issuance, this provision of CETA will become active during the 1982 fiscal year.

Of additional interest is the requirement that each PIC add a member representing "local economic development councils (such as those established under the Public Works and Economic Development Act of 1965)". The reauthorization also mandates that a PIC member representing educational agencies and institutions should have expertise in on-site industry-specific vocational education, and the Issuance notes that "prime sponsors should expand their PIC membership or take other steps necessary to comply with this provision."

Set against these requirements is federal concern about the coordinated review of interagency projects at the federal regional level. Under the

terms of policies enacted by President Jimmy Carter, a set of "operating principles" are guiding federal "efforts to review multi-agency urban development projects proposed by local agencies,"[15] and which involve two or more of the following programs:

> . . . the Economic Development Administration's public works grants and business loan programs; the Housing and Urban Development's Urban Development Action Grant Program; the Small Business Administration's 7(a) business loan program; the Community Services Administration's economic development program, the Department of Labor's Comprehensive Employment and Training program; and the Department of Transportation's Urban Initiatives Program.[16]

The purpose of this review will be to ensure that federal agencies are fully aware of major federal investments and their potential impact in a given area, that opportunities for coordinating projects and services are identified, and that federal agencies are not encouraging inconsistent investments in a given geographic area. Where appropriate, federal regional officials will recommend to each participating federal agency means of enhancing interagency investments and strengthening the development of multi-agency projects to provide jobs for the structurally unemployed.[17]

Such interagency projects should, in addition to normal program objectives, meet the following criteria:

- provide permanent employment for citizens disadvantaged by income or by a history of discrimination
- enhance the immediate physical environment around the project
- strengthen the urban economic base
- possess the support and commitment for implementation of the city and community
- incorporate or have the potential to engender significant private sector investment
- involve the locally coordinated efforts of several federally assisted programs to increase the urban revitalization effects of the proposed project[18]

The delivery of employment and training services, as well as other urban program activities, to individuals at the local level presents obvious problems of coordination. Along with the specific mandates for coordinating manpower training programs and related support services that have been reviewed in this section, there are other more general federal and state mandates for coordination of programs ranging from sewer construction to housing programs -- the whole range of activities that are associated with developing both urban and rural areas.

State-level administrators in charge of delivering various services in Texas, arbitrarily designed their own geographic regions, in an effort to streamline their service delivery process. The problem with this approach is that these administrators have created numerous geographic service areas that are suited only to their individual needs. In numerous instances, as will be shown throughout the remainder of this report, the geographic service areas used by one agency do not coincide with the service areas created by another agency. The result is overlapping jurisdictions and inefficient use of resources, especially in delivering services to people who have multiple needs requiring the resources of more than one program.

This problem has created pressures for Texas state government personnel to try to find ways of correcting these deficiencies. At the same time, federal officials in Washington were grappling with the same problem from a federal perspective. The need for both federal, state, and local officials to coordinate delivery of social services within one or more common areas remains a serious problem.

The problem -- creating standard geographical areas within states, and then having various federal, state, and local program agencies to use those regions as service delivery areas -- was unique during the 1960s and remains a problem during the 1980s.

The attempt to create standard geographical areas in Texas for the delivery of employment and training, and related support services, was a result of state needs, federal initiatives and state responses to those initiatives, and federal laws. Because these federal and state efforts to create these standard areas occurred almost simultaneously, it is useful to discuss them in juxtaposition to one another.

The next section of this report, then, illustrates the development of State Planning Regions (also called Councils of Government, or COGs), the state and federal initiatives and laws creating them, and the concept of Circular No. A-95 Review.

FOOTNOTES FOR PART II

[1]CETA Advisory Council Member Orientation Booklet, U.S. Department of Labor, Employment and Training Administration, Washington: 1976, p. 13. Most of the historical information on manpower programs in this section has been derived from this publication.

[2]The Comprehensive Employment and Training Act of 1973 (PL 93-203).

[3]Ibid.

[4]"Legislative History of PL 93-203," Congressional Administrative News, U.S. Code, 93rd Congress, p. 2952.

[5]Manpower Program Coordination: A Special Report of the National Commission for Manpower Policy, Washington: The Commission, October 1975, p. 3.

[6]The Comprehensive Employment and Training Act of 1978 (PL 95-524).

[7]Ibid., Title I, Section 105.

[8]Ibid., Title I, Section 101. Also Understanding CETA, The National Urban Coalition, Washington, D.C.: The Coalition, 1980, p. 9.

[9]Interview with Michael M. Patterson, Executive Director, State Employment and Training Council, April 1981, taken from the May 1981 issue of the Education-for-Work Linkage News, College Station, Texas: The Education-for-Work Linkage Project, p. 1-4. The account of SETC is taken from this issue.

[10]The Comprehensive Employment and Training Act of 1978 (PL 95-524), Title I, Section 111.

[11]Ibid.

[12]Ibid.

[13]Interview with Alton D. Ice, Executive Director, Advisory Council for Technical-Vocational Education in Texas, April 1981, taken from the May 1981 issue of the Education-for-Work Linkage News, College Station, Texas: The Education-for-Work Linkage Project, p. 1-4. The account of ACTVE activities is taken from this issue.

[14]The President's Interagency Coordinating Council Employment Initiatives, n.p., (Washington, D.C.?), April 1979, p. 8.

[15]Ibid., p. 26.

[16]Op cit.

[17]Op cit.

[18]Op cit., p. 26-7.

PART III: HISTORICAL PERSPECTIVE OF COORDINATION -- THE DEVELOPMENT OF COGs, STATE AND FEDERAL INITIATIVES, AND CIRCULAR NO. A-95 REVIEW

Federal and state-funded social service programs are a relatively new phenomenon in the U.S., existing only since the 1930s. The persons who conceived the various federal, state, and local governmental structures did not think in terms of establishing these entities in a manner that would easily coordinate the delivery of a variety of social services to individuals.

Consequently, any approach to solving problems connected with coordinating services would be, by definition, something new.

The concept of what are now called Regional Planning Councils, or Councils of Government (COGs), in Texas evolved formally during the 1960s as a result of the problems of administering growing numbers of federal, state and local social service programs. Urban areas presented special problems. One report noted that during this period "a polyglot mixture of cities, school districts, and special districts" were attempting to perform basic governmental services for Texas citizens.[1]

During the time that the movement in Texas to establish what are now COGs was taking place, similar events in Washington, D.C., were occurring. These efforts were aimed at addressing, from a national perspective, the problems beginning to beset Texas at the state and local levels. Federal officials, aware of the increasing problems of coordinating federal programs at the local level, began to formulate approaches to solving these problems.

Flood control, transportation, and water resources planning had already been taking place in Texas for many years. The organizations dealing with these planning efforts addressed the needs of both urban and rural areas of Texas; however, many of the areas created were multijurisdictional and

in some cases different planning groups had overlapping authority. Since no central planning authority existed during these years, these characteristics are not surprising. The increase in the number and type of social programs enacted during the 1960s, however, combined with administrative problems unique to the wide array of local units of governments in Texas, made evident the need for comprehensive regional planning.

The first federal legislation providing an impetus for the development of COGs arose from 1964 amendments to the United States Housing Act of 1954 (PL 83-530). The amending legislation, PL 89-560, states:

> In order to assist State and local governments in solving planning problems resulting from the increasing concentration of population in metropolitan and other urban areas, including smaller communities; to facilitate comprehensive planning for urban development, including coordinated transportation systems, on a continuing basis by such governments; and to encourage such governments to establish and improve planning staffs, the Administrator (of the Act) is authorized to make planning grants to . . . official state, metropolitan and regional planning agencies or other agencies or instrumentalities designated by the Governor (or Governors in the case of interstate planning) and acceptable to the Administrator, empowered under State or local laws or interstate compact, to form metropolitan or regional planning agencies . . .[2]

The authority for organizing regional councils was restricted to regions centering on or containing a Standard Metropolitan Statistical Area (also called SMSAs, which are defined as contiguous urban areas containing at least 50,000 population).[3] At that time, Texas contained 23 SMSAs.[4]

James F. Ray, the current Executive Director of the Texas Association of Regional Councils and headquartered in Austin, declared of this period that:

> At first blush, rural water and sewer planning and comprehensive planning for urban areas would seem to be clearly separate. In like manner, natural resource conservation would seem fairly distinguishable from an economic development program that envisioned grants and loans to attract and expand industry. However, in each instance, these distinctions were blurred as the local organizations and the federal agencies which encouraged them sought to serve multiple needs of their clientele.

> Councils of Government, conceived as metropolitan planning and problem solving bodies, took on regional dimensions as they spread outward beyond the physical boundaries of Standard Metropolitan Statistical Areas to take in predominately rural counties in the metropolitan areas' spheres of influence. Rural planning commissions originally envisioned as organizations to carry out the planning of water and sewer systems became involved in 'detailed reports' on education, health, transportation, and recreation facilities, on industrial and commercial development, and on population projections and desirable distribution. In addition rural planning commissions were planning for rural communities of up to 5,500 population, many of which were defined as urban communities by the Department of Housing and Urban Development for the purpose of supporting comprehensive planning undertaken by councils of governments. Economic development districts with their mandate to cover economic resource development, physical planning, capital budgeting, and human resource development in their planning and development operation could little avoid overlapping the functions of the other three types of organizations. In like manner, resource conservation and development projects, while focused on natural resource development, maintained the concept of 'total resource development' and thus became involved in planning for and encouraging such diverse projects as public housing, water and sewer systems, industrial schools, junior colleges, and recreation centers.[5]

"With duplication of functional concerns came duplication in data collection operations and staff activities and the constant threat of conflicting plans and operations," said Ray. "Local political subdivisions were asked to support this duplication financially and otherwise, and local leaders were in numerous cases asked to serve on policy bodies of two or more of the four types of organizations." " That," indicates Ray, "was the situation in Texas in December of 1966."[6]

The "four types of organizations" referred to by Ray resulted from federal legislation. By early 1965, there were four major multipurpose federal programs that required or encouraged representatives of local governments to band together into areawide organizations for the purpose of joint planning and coordinating their activities.

These organizations were:

- Economic Development Districts, created by the Public Works and Economic Development Act of 1965 (PL 89-136)
- Rural Planning Commissions, created by the Consolidated Farmers Home Administration Act of 1961 (PL 87-128) as amended by PL 89-240 in 1965
- Resource Conservation and Development Projects, created by the Food and Agriculture Act of 1962 (PL 87-703)
- Regional Planning Commissions and Councils of Government, created by the U.S. Housing Act of 1954 (PL 83-530), as amended in 1964 by PL 89-560; and by the Housing and Urban Development Act of 1965 (PL 89-117)

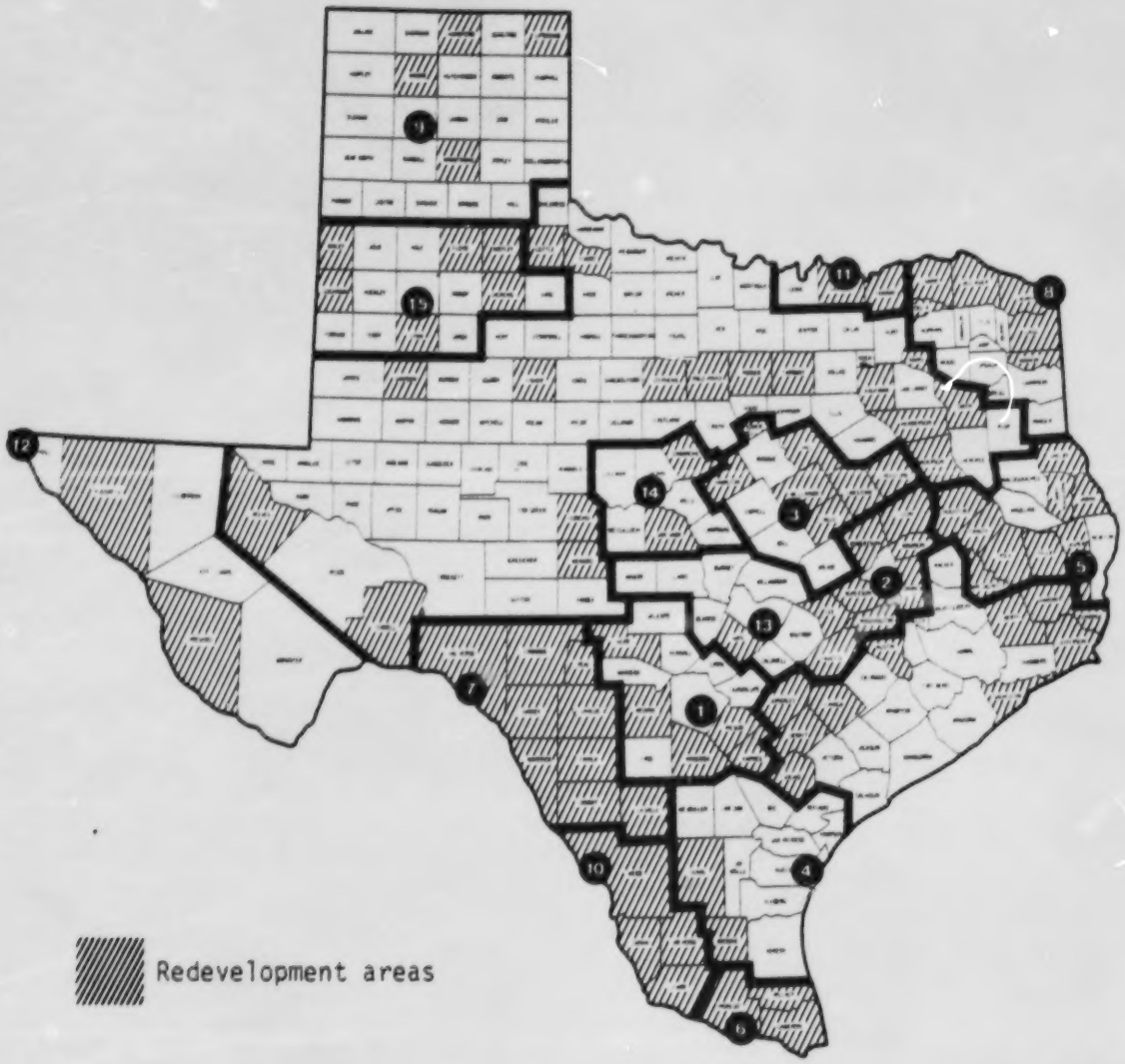
"By the fall of 1966, multijurisdictional planning and development organizations were organized or being organized all across Texas," said Ray. The boundaries of these organizations overlapped.[8] By January 1967, approximately 80 multijurisdictional planning and development organizations in Texas had been established. They were comprised on five basic types: Councils of Government; Economic Development Districts; Single County Rural Planning Commissions; Multicounty Rural Planning Commissions; and Resource Conservation and Development Projects.[9]

Because Economic Development Districts are a logical entity through which economic development programs can be coordinated with CETA and related employment and training programs and support services, it is useful to review the function of these districts.

Figure 9 illustrates the service areas of the 15 Economic Development Districts in Texas; 12 of these are also regional Councils of Government (COGs). The remaining three are independent Economic Development Districts. The counties which have been shaded represent redevelopment areas; these are areas which qualify for assistance from the Economic Development Administration as a result of high unemployment rates and other similar characteristics.

FIGURE 9

Economic Development Districts in Texas
(Formed Under U.S. Public Works and Economic Development Act of 1965)



SOURCE: Economic Development Administration, Austin, Texas; and Governor's Office of Budget and Planning, Austin, Texas, June 1981.

Offices of Economic Development Districts in Texas

1. Alamo Area Council of Governments*
   San Antonio
2. Brazos Valley Development Council*
   Bryan
3. Central Texas Economic Development District
   Waco
4. Coastal Bend Council of Governments*
   Corpus Christi
5. Deep East Texas Council of Governments*
   Jasper
6. Lower Rio Grande Development Council*
   McAllen
7. Middle Rio Grande Development Council*
   Del Rio
8. North East Texas Economic Development District
   Texarkana
9. Panhandle Regional Planning Commission*
   Amarillo
10. South Texas Development Council*
    Laredo
11. Texoma Regional Planning Commission*
    Denison
12. West Texas Council of Governments*
    El Paso
13. Capital Area Planning Council*
    Austin
14. Pecan Valley Economic District
    Brownwood
15. South Plains Association of Governments*
    Lubbock

*Regional Council of Government

SOURCE: Governor's Office of Budget and Planning, Austin, Texas, June 1981.

Programs carried out by the Economic Development Administration are as follows: Public Works; Supplemental Grants to Governors; Economic Adjustment Assistance; Business Development; Technical Assistance; Economic Development Planning; Economic Research; Trade Adjustment Assistance; and Local Public Works.[10]

Public Works

Authorized under Title I of the Public Works and Economic Development Act of 1965 (PL 89-136), the purpose is to help provide public works and development facilities needed to attract new industry and encourage the expansion of business. The Act provides direct grants for acquisition or development of land and improvements, for public works for industrial development, business and commercial development, skill development facilities, and other purposes; direct grants will not exceed 50 percent of total project costs.

Supplemental grants are available to assist distressed areas in meeting their share of matching costs; however, in some cases 100 percent funding may be awarded. Typically, though, federal funds will not exceed 80 percent.

In addition to direct grants and supplemental grants, loans and loan guarantees for public works projects were authorized under Title II of the Public Works and Economic Development Act of 1965.

Awards to eligible recipients are contingent upon agreement with a local overall economic development program. Projects up to $500,000 may be approved by Regional Directors. If the funding request exceeds that amount, the Assistant Secretary for Economic Development must approve the request.

Supplemental Grants to Governors

Authorized by Section 304 of the Public Works and Economic Development Act of 1965, the purpose is to provide governors with funds to supplement the resources of local areas in order to meet the matching provisions of other Economic Development Administration (EDA) grants.

Economic Adjustment Assistance

Authorized by Title IX of the Public Works and Economic Development Act Amendments of 1974 and 1976, the purpose is to assist communities to cope with actual or threatened problems related to changes or threatened changes in their economies. These problems may be caused by long term economic deterioriation or abrupt economic change. Another purpose is to encourage cooperative intergovernmental action to prevent or solve economic adjustment problems.

Eligible recipients are areas with at least 15 percent of the population below the poverty line as defined by the President's Office of Management and Budget (OMB), unemployment rates exceeding the national average for at least six consecutive months, and an economic planning and management capacity sufficient to administer the grant.

Title IX grants may be made for either implementation or strategies. Eligible activities include: providing public services; planning; constructing public facilities; unemployment compensation; rent supplements; research; technical assistance; mortgage payment assistance; rent supplements; training; and relocation of businesses and individuals.

Business Development

To help industry to establish, expand or maintain operations in areas where employment is scarce in order to upgrade the areas economically by creating or retaining jobs, EDA's business development programs were

authorized under Title II of the Public Works and Economic Development Act of 1965 and the Trade Act of 1974. No assistance provided through EDA's business development program may be used to defray the costs of relocating one economic activity from one area to another.

Business development assistance may be in the form of loan guarantees, the purchase of fixed assets and operating capital through loans, or a combination of the two. Individual firms that have been approved by a state or local development agency may also receive a guarantee of rental repayments or losses.

Applications for business development assistance are procured by the regional offices; however, final approval is the responsibility of the national office. Business development loans are limited to 50 percent for any tourism project, 65 percent of aggregate cost for fixed assets, and are generally limited to $10,000 for any one firm.

Technical Assistance

Authorized by Section 301 of the Public Works and Economic Development Act of 1965, the purpose is to help communities meet economic challenges and shape programs of economic development. Unlike most EDA assistance, technical assistance grants may be awarded to areas that are not designated as eligible by the Secretary. Technical assistance may be aid from EDA staff, from other federal agencies, and through contracts or grants-in-aid to public or private nonprofit local organizations. Such assistance includes project planning, feasibility studies, management assistance, and studies evaluating the needs of the area. Technical assistance awards may fund up to 75 percent of the administrative expenses of eligible organizations.

Economic Development Planning

Authorized under Section 302 of the Public Works and Economic Development Act Amendments of 1974, the purpose is to strengthen the capacity of subnational units of government to address their economic problems. Grants to eligible states, cities, redevelopment areas, and economic development districts may cover up to 80 percent of the cost of economic development planning.

Economic Research

Authorized by Section 301 of the Public Works and Economic Development Act of 1965, the purpose is to assist in determining the causes of unemployment and underemployment in various areas in the nation and assist in formulating and implementing national policies. Program activities include contracts for conferences, workshops, training, and research.

Trade Adjustement Assistance

Authorized by the Trade Act of 1974, the purpose is to assist firms in industry threatened by increased international trade, through diversification or other means, to save jobs in local areas. To accomplish this goal, loans of up to $1 million and loan guarantees of up to $4 million may be awarded to firms or communities that demonstrate a decline in sales or production due to increased imports.

Local Public Works

Authorized by the Public Works Employment Act of 1976 and the Economic Stimulus Appropriations Act of 1977, the purpose was to provide short-term jobs, expecially in the hard-hit construction industry, and to provide community facilities necessary for long-term growth and development. The provisions of this program have been severely curtailed by the Reagan Administration.

At the same time that the five basic types of multijurisdictional organizations -- Councils of Government; Economic Development Districts; Single County Rural Planning Commissions; Multicounty Rural Planning Commissions; and Resource Conservation and Development Projects -- were being formed, the Texas Legislature was taking action to create an administrative structure to respond to the problems created by uncoordinated planning activities.

One problem affecting a number of different social programs during the early 1960s in Texas was that of water resources planning. The availability of water then, as now, is a problem critical to many different kinds of socioeconomic development.

Meeting in early 1965, the 59th Texas Legislature

> . . . not only took action to reorganize Texas' water agencies, but also responded to the call for an interagency council to coordinate the planning efforts of the state. In the closing days of the session, the Legislature passed Senate Concurrent Resolution 68 creating the Planning Agency Council for Texas. In creating the Council, soon to become known as PACT, the Legislature took note that it had given statutory planning authority to a number of state departments and agencies but that there was no convenient 'clearing house' for these ideas, no central agency to coordinate activities into a unified, overall program which could efficiently eliminate overlapping or conflicting operations.[11]

The Legislature designated PACT as this agency, and constituted it "to include initially eight member agencies with a staff from the Governor's Office to perform administrative and coordinative duties."[12]

The concept of regional planning in Texas was formalized by the Regional Planning Act of 1965 (Article 1011m, V.A.C.S.), which was passed by the 59th Texas Legislature. The Act "served as the enabling legislation establishing councils of government in Texas," and almost "immediately" after its passage the organization of regional councils in the major metropolitan areas of Texas began.[13]

The Act specified that

> Any two or more general purpose governments may join in the exercise, performance, and cooperation of planning, powers, duties, and functions as provided by law for any or all such government units. When two or more such government units agree, by ordinance, resolution, rule, order or other means, to cooperate in regional planning, they may establish a Regional Planning Commission.[14]

Under this Act a regional planning commission became a political subdivision,

> . . . the general purpose of which is to make studies and plans to guide the unified, far-reaching development of the area, to eliminate duplication, and to promote economy and efficiency in the coordinated development of the area.[15]

One of the most important functions of the newly authorized COGs was their ability to act as a "pass-through" mechanism for receiving funds, and to contract for services. The Act declares that any COG

> . . . is authorized to apply for, contract for, receive and expend for its purposes any funds or grants, from any participating governmental unit or from the State of Texas, federal government, or any other source.[16]

For the first time, two important definitions for the purpose of coordination activities were now law -- the definitions of "regional" and "comprehensive development planning process." They are:

> 'Region,' 'Area,' or 'Regional' means a geographic area consisting of a county or two or more adjoining counties which have common problems of transportaton, water supply, drainage or land use, similar, common or interrelated problems of agriculture, forestry, conservation or other matters, or any combination thereof. It is the intention of this Act to permit the greatest possible flexibility among the various participating governmental units to organize and establish Commissions most suitable to the nature of the area problems as they see them.[17]
>
> 'Comprehensive Development Planning Process' means the process of
> 1. Assessing the needs and resources of an area;
> 2. Formulating goals, objectives, policies and standards to guide its long-range physical, economic, and human resource development; and
> 3. Preparing plans and programs therefor which
>   A. Identify alternative courses of action and the spatial and functional relationships among the activities to be carried out thereunder;
>   B. Specify the appropriate ordering in time of such activities;

C. Take into account other relevant factors affecting the achievement of the desired development of the area;
D. Provide an overall framework and guide for the preparation of function and project development plans;
E. Make recommendations for long-range programming and financing of capital projects and facilities which are of mutual concern to two or more member governments; and
F. Make other such recommendations as may be deemed appropriate.[18]

Councils of Government are empowered to "purchase, lease or otherwise acquire, hold, sell or otherwise dispose of real and personal property;" and employ a professional staff;[19] however, "the geographic boundaries of Commissions established under this Act must be consistent with State Planning Regions or Subregions as delineated by the Governor."[20] The potential for international planning became real, as the Act declared that

> With advance approval of the Governor, a (Council of Government) in a region or area contiguous to areas in the Republic of Mexico may expend the funds available under the provisions of Section 6 of this Act in cooperaton with agencies of the Republic of Mexico or its constituent states or local governments for planning studies encompassing areas lying both in this state and in contiguous territory of the Republic of Mexico.[21]

Using the Regional Planning Act of 1965 as a framework, Texas Governor John Connally established 21 State Planning Regions, or Councils of Government (COGs) in 1968; this number was later expanded to 24. An official Memorandum of the Governor dated December 16, 1968, established these regions, whose official purpose was defined as:

- A regional framework for the coordination of functional planning activities of State agencies
- A guide for State and Federal agencies in developing regions for the delivery of services
- The geographic framework against which the boundaries of (locally formed) regional organizations will be approved[22]

The newly created COGs were

> . . . designed to comprise the future State service districts for State agencies. Although some degree of regional planning activity has begun in all 21 State Planning Regions, the State has not as yet developed a formal policy as to how regional council organization relates to State Planning Regions.[23]

In Texas, a regional Council of Government (COG) is called many different names: Regional Planning Commission, Regional Planning Council, Association of Governments, Area Council and Development Council. The reason that COGs are called by so many different names is that local officials, by law, have the prerogative of naming their COG however they see fit. Therefore, the Lower Rio Grande Development Council, the Texoma Regional Planning Commission, the Houston-Galveston Area Council, and the South Plains Association of Governments all describe the same thing -- a local arrangement of a Council of Governments.

For an up-to-date view of the nature and functions of COGs in Texas, see Appendix I.

A map of the 24 Texas Planning Regions and Regional Councils of Government is shown in Figure 10. A list of the name and location of each COG follows this map.

In the meantime, PACT members, as a result of informal discussions with member agencies, studying the numerous federal grant-in-aid programs which carried with them planning requirements, and investigations into the planning and coordination activities of other states, began to pull together a set of strategies to address Texas' needs. By February 1966, PACT was described as having the following potentials:

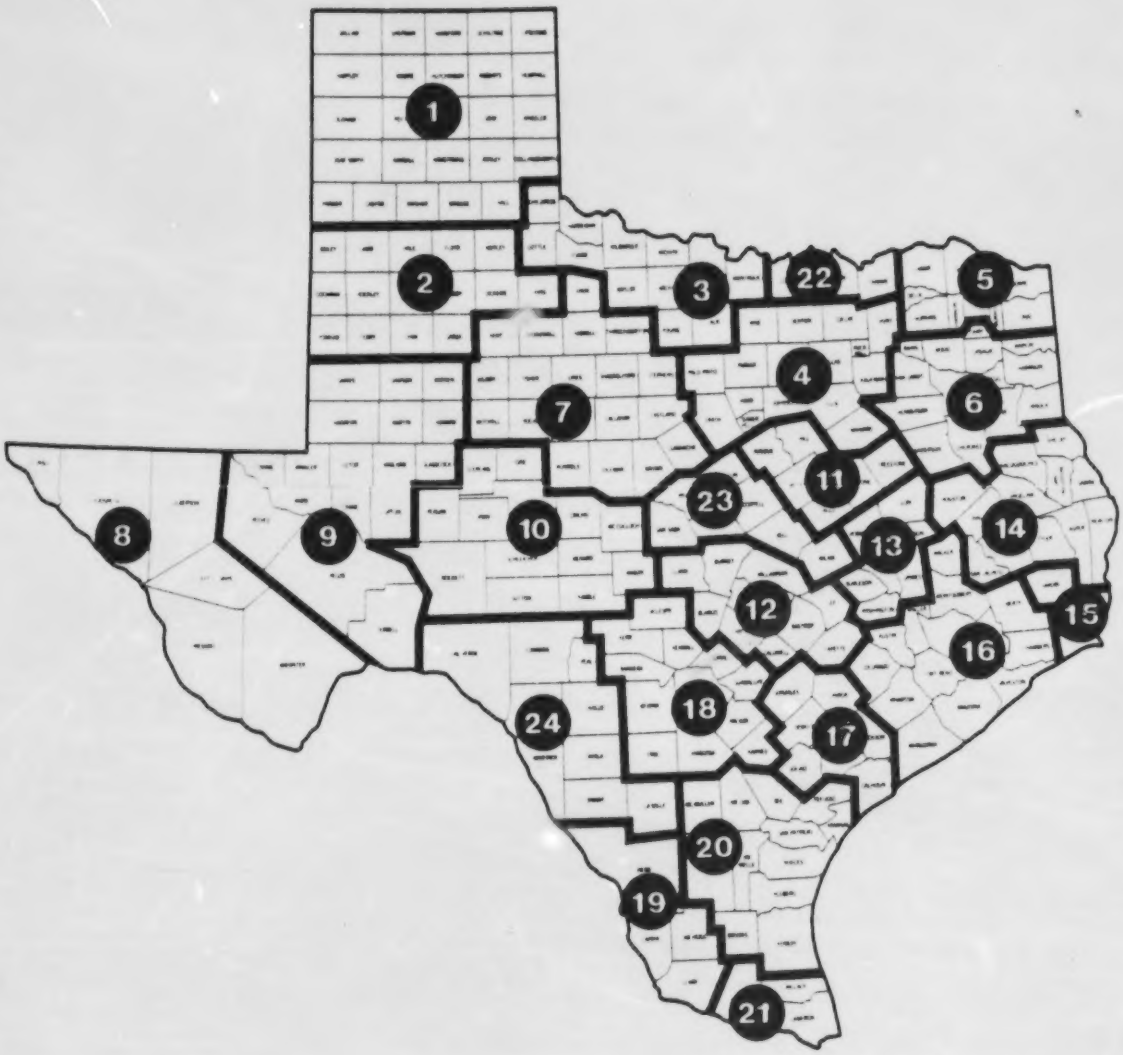
1. A new tool for the Governor of Texas to use to foster cooperation and coordination of the work of the independent state agencies.

2. A screening device for the review and analysis of federal aid grants to both state and local agencies.

3. An agency to prepare a long-range state physical resources development plan into which could be fitted the individual plans of state resource management agencies and those of local and regional units of government.

FIGURE 10

Texas Planning Regions and Regional Councils of Government



SOURCE: Handbook of Governments in Texas, Texas Advisory Commission on Intergovernmental Relations, Austin: The Commission, May 1979, p. V-7.

Texas Planning Regions and Regional Councils of Government

1. Panhandle Regional Planning Commission
   Amarillo
2. South Plains Association of Governments
   Lubbock
3. Nortex Regional Planning Commission
   Wichita Falls
4. North Central Texas Council of Governments
   Arlington
5. Ark-Tex Council of Governments
   Texarkana
6. East Texas Council of Governments
   Kilgore
7. West Central Texas Council of Governments
   Abilene
8. West Texas Council of Governments
   El Paso
9. Permian Basin Regional Planning Commission
   Midland
10. Concho Valley Council of Governments
    San Angelo
11. Heart of Texas Council of Governments
    Waco
12. Capital Area Planning Council
    Austin
13. Brazos Valley Development Council
    Bryan
14. Deep East Texas Council of Governments
    Lufkin
15. South East Texas Regional Planning Commission
    Nederland
16. Houston-Galveston Area Council
    Houston

Texas Planning Regions and Regional Councils of Government

17. Golden Crescent Council of Governments
    Victoria

18. Alamo Area Council of Governments
    San Antonio

19. South Texas Development Council
    Laredo

20. Coastal Bend Council of Governments
    Corpus Christi

21. Lower Rio Grande Valley Development Council
    McAllen, Texas

22. Texoma Regional Planning Commission
    Denison

23. Central Texas Council of Governments
    Belton

24. Middle Rio Grande Development Council
    Del Rio

SOURCE: Governor's Office of Budget and Planning, Austin, Texas, June 1981.

4. An instrument for long-range capital budgeting to permit the investment of state funds so as to maximize economic development.

5. An agency for the coordination of 'people plans' such as:
   A. Welfare and Health Services;
   B. Vocational Education;
   C. Services to Rural Citizens; and
   D. Prevention of Delinquency[24]

Several significant aspects of the PACT operation were evident by September 1966; Ray explains:

> First, PACT had moved rapidly beyond its original concept as an interagency council to coordinate the State Water Plan with the plans of other state agencies and had taken on the responsibility of general interagency planning coordination. Secondly, PACT had in a relatively short time expanded its area of attention to include social as well as physical planning and coordination. Thirdly, it had become evident that PACT must operate on two planes if it was to be an effective instrument of state government in the 1960s. PACT would have to function not only on the horizontal plane -- planning and coordination among state agencies -- but also on the vertical place -- coordination of state plans and activities with those of localities, metropolitan areas and regions, and the federal government.[25]

A study design for interagency coordination and planning was completed by a consultant, and submitted to the 60th Texas Legislature in 1967. The report laid forth the critical areas of planning and coordination that PACT would affect. The report also "called for adoption of new legislation designating the Governor as the Chief Planning Officer of the State, formalizing the PACT staff in the Governor's Office into a Division of Planning Coordination, creating 'interagency planning councils' or PACT groups for such functional areas of government concern as education, natural resources, and health, and providing for joint studies to be conducted by the interagency planning councils." House Bill 276, passed by the 60th Texas Legislature in 1967, enacted these provisions of the proposed legislation into law.[26]

Meanwhile, the Executive Office of President Lyndon Johnson had turned its attention to the need for coordination of multipurpose districts.

During the summer and early fall of 1966, federal agencies were asked to submit detailed information on planning and development districts, and procedures for coordination of such districts, to the Bureau of the Budget (later renamed the President's Office of Management and Budget, or OMB). The result of these activities came in the form of a Presidental memorandum to the Secretaries of Commerce; Health, Education and Welfare; Housing and Urban Development; Interior; Agriculture; and to the Director of the Office of Economic Opportunity; the Co-Chairman of the Appalachian Regional Commission; and the Director of the Bureau of the Budget. Issued September 2, 1966, with its subject listed as "Coordination for Development Planning," it read:

> The Federal Government, through a number of departments and agencies, is now authorized to require and assist State and local governments and specialized agencies to formulate and carry out development plans.
>
> Comprehensive planning covering wide areas is a promising and extremely important beginning to the solution of critical State, metropolitan, and regional problems. It is essential that it be done well.
>
> At the Federal level, we must coordinate our efforts to prevent conflict and duplication among federally-assisted comprehensive planning efforts.
>
> This should have two aspects:
>
> State and local development planning agencies should be encouraged to work together in using common or consistent planning bases (i.e., statistical and economic estimates), and in sharing facilities and resources.
>
> Boundaries for planning and development districts assisted by the Federal Government should be the same and should be consistent with established State planning districts and regions. Exceptions should be made only where there is clear justification.
>
> I am requesting the head of each of the departments and agencies concerned with these matters to work with the Director of the Bureau of the Budget to insure the fullest coordination in fixing the boundaries of multi-jurisdictional planning units assisted by the Federal Government.[27]

This Memorandum, in noting the role of the state in establishing planning districts and regions, provided a valuable tool for the Governor's planning staff to use in their dealings with federal agencies. It also urged federal agencies to "insure the fullest coordination" in fixing the boundaries of multijurisdictional planning and development organizations. It provided a "welcome backstop" to state actions designed to insure coordination.[28]

The first formal action to create COGs in Texas came during late 1966 and early 1967, when representatives of the Department of Housing and Urban Development, the Economic Development Administration, and the Texas Governor's Office met several times to work out details of planning coordination in the Lower Rio Grande Valley, and the Laredo area. The expectations of the Governor's Office and the requirements of each federal agency as to the politically responsible nature of such organizations in Texas had to be combined.

The agreement hinged on three basic points:

1. Multipurpose organizations created in Texas should be organized under Article 1011m as regional planning commissions.
2. The governing body of a multipurpose planning and development organization in Texas should be composed of at least 51 percent elected officials of participating cities.
3. The remaining portion of the governing body (above the percentage of elected officials) should broadly represent other governmental agencies, economic interests, citizens' groups, and so forth.

It should be noted that on the third point then, as now, the problem of representation and political philosophy emerged. "On one side was the Department of Housing and Urban Development and the Governor's Office insistent upon organizations that were composed primarily of the elected officials of cities and counties," said Ray. "On the other side was the Economic Development Administration with its requirements for representation of business, labor, and agriculture as well as minority groups, the underemployed, and the unemployed."

A compromise was reached by stipulating that such groups should be "broadly" represented, and that the exact composition of the governing body would be determined locally.

The question of equitable representation through a COG has never been satisfactorily resolved. Attempting to extend the principle of "one man, one vote" to a COG has proved to be a difficult goal. Under the current system of organization, regional council governing boards must be composed of at least 66 2/3 percent elected local government officials.[29]

While these ubiquitous questions were being considered by Texas officials, policy makers in Washington also were busy:

> In response to the Presidential Memorandum of September 2, 1966, the Bureau of the Budget on January 31, 1967, issued Circular No. A-80, directed to the heads of executive departments and establishments. This Circular emphasized that efficient accomplishment of many federal program missions depended in large measure on the quality, comprehensiveness, and degree of coordination of physical, economic and human resources planning efforts. It called attention to the Presidential Memorandum requiring coordination and common boundaries and declared its purpose to be to provide general guidelines to the agencies in meeting these objectives.[30]

Circular No. A-80 established a 30-day review period for state governors to review the proposed boundaries of any proposed planning and development district or region, and comment upon its relationship to planning and development districts or regions established by the state. Before a planning and development district could be established, the agency would establish that

1. Related programs or activities being carried on within the district or region had been identified by the applicant;
2. Such related programs were being planned on the same geographical basis; or
3. Where the designated area would have boundaries different than those within which related programs were being planned, there were compelling reasons for such differences.[31]

Designed to assure regional consistency in states from the federal viewpoint, Circular No. A-80 established a review mechanism for state officials to coordinate with federal officials to assure the fullest consistency and coordination among planning activities. It should be noted that Circular No. A-80 was an attempt to insure coordination of federally-supported planning and development activities within states.

Since 1967, regional councils have had legislative authority for coordinating many federal programs at the local level. Under Section 204a of the Demonstration Cities and Metropolitan Development Act of 1966, the Governor may designate agencies which are responsible for reviewing and commenting upon a variety of program applications which originate at the local level. This Act states that

> All applications made after June 30, 1967, for Federal loans or grants to assist in carrying out . . . (specified) . . . projects within any metropolitan area shall be submitted for review . . .
>
> 1. . . . to any areawide agency which is designated to perform metropolitan regional planning for the area wherein the assistance is to be used, and which is, to the greatest practicable extent, composed or responsible to the elected officials of the unit of areawide government or the unit of general local government within whose jurisdiction such agency is authorized to engage in such planning, and
>
> 2. . . . if made by a special purpose unit of government, to the unit or units of local general government within whose authority to operate the project is to be located.[32]

In 1968, the 1954 Housing Act was again amended (by PL 90-448); this amendment authorizes federal 701 grants to nonmetropolitan regional councils. Administered by the U.S. Department of Housing and Urban Development, 701 grants are given to local agencies to engage in comprehensive planning activities. Since comprehensive planning was a requirement to receive many types of federal funds, cities and councils applied for and used 701 funds to develop these plans. By the mid to last 1970s the funds for these grants had been used up, and little more were seen forthcoming. The 701 grants

were authorized for regional agencies centered in counties with a population of no less than 25,000 and which did not contain a Standard Metropolitan Statistical Area. The nonmetropolitan regional councils, coupled with the metropolitan agencies, comprise the potential for organizing virtually all local units of government within Texas.[33]

In an effort to standardize the principles under which local programs are funded by federal dollars, and to assure that these expenditures were neither wasteful nor duplicative, Congress acted in 1968 to assure that these funds were expended efficiently.

The 90th Congress enacted the Intergovernmental Cooperation Act of 1968 (PL 90-577), to assure that federal funds used to finance local programs were put to the best possible use. This Act was revised in 1976 by Presidential order.[34]

Initially, this legislation called for achieving the fullest cooperation and coordination of the activities of federal programs. The Preamble to the law, written by the Committee on Government Operations, states:

> The Committee on Government Operations, to whom was referred the bill (H.R. 18826), to achieve the fullest cooperation and coordination of activities among the levels of government in order to improve the operation of our Federal system in an increasingly complex society, to improve the administration of grants-in-aid to the states, to permit provision of reimbursable technical services to State and local government, to establish coordinated intergovernmental policy and administration of grants and loans . . . (reports) favorably thereon without amendment . . .[35]

The Act's purpose was

> . . . to strengthen State and local government and improve the relations between those governments and the Federal Government through closer cooperation and coordination of policies and activities . . . . The bill provides a means whereby certain troublesome problems in these relations may be avoided.[36]

The Act further gave the President the power to establish rules and regulations furthering the ends of the legislation.

Title IV of the Intergovernmental Cooperation Act of 1968 establishes a review procedure. A Presidential decree established the President's Office of Management and Budget (formerly the Bureau of the Budget) as the authority vested with the responsibility for review and coordination. The actual review mechanism was passed on to each state's government as a condition of receiving federal funds. In response to this new requirement, states had to review the impact of federal programs in their local areas, and to provide assurances that funds received from the federal government would not be used to duplicate services already offered, or be wastefully expended.

In partial implementation of the Intergovernmental Cooperation Act of 1968, the President's Office of Management and Budget issued Circular No. A-95 on July 24, 1969. A major revision was issued on February 9, 1971; and certain other substantive amendments were put into law in a separate issuance on March 8, 1972. Another revision on November 13, 1973, incorporates past revisions and amendments, adds certain clarifications and refinements, and expands the coverage of the "Project Notification and Review System" to cover a substantial number of human resources programs.[37] The latest revision of Circular No. A-95 was issued January 13, 1976.[38]

The Project Notification and Review Process is largely based on an earlier law, Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966. "Section 204 requires that application for Federal assistance to a wide variety of public facilities-type projects (highways, hospitals, etc.) in metropolitan areas must be accompanied by the comments of an areawide comprehensive planning agency as to the relationship of the proposed project to the planned development of the area."[39]

It is, however, upon the Intergovernmental Cooperation Act of 1968 (PL 90-577) which the broad policy base of Circular No. A-95 rests. This

Act is

> . . . fundamentally a statement of national policy which asserts the cooperative, intergovernmental nature of federalism and directs the close coordination of federal and federally assisted plans and programs for the development of the nation's physical, natural, economic, and human resources with state, areawide, and local plans and programs.[40]

Title IV of the Act lies at the heart of the principles establishing A-95 Review; it directs the President to

> . . . establish rules and regulations governing the formulation, evaluation, and review of Federal programs having a significant impact on area and community development.[41]

It is important to note that the preceding consitute federal initiatives; therefore, the degree to which states respond to these initiatives depend upon state -- and to some extent local -- perceptions of how important the federal dollar is to state and/or local development.

One summary of Title IV indicates that it is

> . . . designed to provide coordination on the Federal level of the sometime numerous separate assistance programs and funds which may be focused on a given community by various Federal agencies. These programs, though beneficial to the areas they serve, are frequently duplicating, overlapping and seemingly in conflict with each other. Such administration can create severe confusion and have an ill effect on the recipient local government and its future development. Accordingly, the President is given discretionary authority to establish rules and regulations governing Federal programs and projects to the end that they most effectively serve certain stated objectives considered important to healthful living and orderly community development. The title further requires that all viewpoints and objectives — national, regional, State and local — to the extent possible, be considered when Federal development projects are being planned. Federal aid, to the maximum extent possible, shall be consistent with the objectives of State, regional, and local comprehensive planning. *Each Federal department and agency administering a development assistance program must consult with and seek advice from other significantly affected Federal agencies in an effort to assure fully coordinated programs. Insofar as possible, Federal planning shall be coordinated with and made a part of local and areawide development planning. Furthermore, to strengthen local government, Federal agencies in making loans or grants should give preference to units of general local government over special-purpose units* [Italics added]. "This title originally applied only to Federal programs in urban areas but was expanded by the committee to include rural areas where many of the same problems in administration of Federal assistance exist.[42]

In examining Title IV itself, the following citations reflect these objectives:

> Section 401(b) of the Act requires that 'all viewpoints — national, state, regional, and local — shall, to the extent possible, be taken into account in planning federal or federally assisted development programs and projects.' Section 401(c) requires that, consistent with national objectives, 'all federal aid for development purposes shall be consistent with and further the objectives of state, regional and local planning. 43

Initiated by Section 204a of the Demonstration Cities and Metropolitan Development Act of 1966, and given further impetus by passage of the Intergovernmental Cooperation Act of 1968, Circular No. A-95 Review

> is an extension and refinement of [this] authority, accomplished by the establishment of a project notification and review system operating through a system of regional clearinghouses, where regional clearinghouses exist, of intent to file application for aid. The regional clearinghouse agency then has the opportunity to make appropriate comments upon the application. These comments must be submitted to the granting agency along with the application. 44

As indicated earlier in this section, Texas had a variety of multipurpose districts operating by January 1967. Given that these kinds of districts, without some central guiding force, would continue to proliferate, it is not surprising that the Texas Governor's Office moved in 1968 to bring some order out of chaos.

In 1968, the Governor's Office conducted a study to establish what are now State Planning Regions, or Councils of Government (COGs). That year, Texas Governor John Connally recommended that the Texas Legislature create formal state planning regions, and regional planning commissions within these areas, as the mechanism for substate review of applications for federal funds to be used for local programs.

In 1968, 21 regional planning areas in Texas were created; however, the regional planning commissions subsequently created within these areas were to "review and comment upon area governments' applications for Federal funds" and "develop regional plans and encourage cooperative action by local governments."[45]

The regional planning commissions, or COGs, have only advisory powers, unless the COG contracts with a state or federal agency to perform a service for that agency.

One researcher notes:

> The development of multi-county regions in Texas has occurred partially as a response to national trends, in that area planning is a requirement for many types of Federal assistance. Also, Governor John Connally had stated that the boundaries of then-existent regions or districts used by many state and Federal agencies and locally-formed regional organizations overlapped and often conflicted. This situation had led to confusion and hindered effective administration and planning. Thus, the Office of the Governor formulated the State Planning Regions to encourage the coordination of functional planning activities of state agencies and to guide state and Federal agencies in developing regions for the delivery of services. While some problems specific to one city or sector of a region could be solved within the formal political arena, the Regions were formed because of the proliferation of problems which were considered areawide in nature.[46]

Finally, the 61st Texas Legislature amended the Regional Planning Act of 1965 to broaden the powers of regional councils. The amended Act

> (Redefines) Commission and region, area, or regional; (provides) for a definition of the comprehensive development planning process; (designates) a Regional Planning Commission as a political subdivision of the State; (provides) for contracts between such Commissions and their member governments; (authorizes) Regional Planning Commissions to acquire and dispose of property, emplo, staff, consult with and retain experts, and provide for employee retirement benefits; (provides) for State financial assistance; (authorizes) a governmental unit on a majority vote of its membership qualified in serving to withdraw from a Regional Planning Commission unless agreed to the contrary; (and provides) for interstate and international cooperation . . .[47]

Established as a political subdivision of Texas vested with broad powers, the regional council serves as an increasingly important mechanism for solving both rural and urban problems through cooperative local action.

While the term "region" already had a basis in law as a result of the state-level Regional Planning Act of 1965, as amended, it is useful to note an additional perspective:

> Towns and cities tend to be grouped into a heirarchy in which position is dictated by the quantity and diversity of services provided. Smaller towns and cities usually serve as the sites for servicing their immediate environs. In Texas, they may often serve as the trade center in an agricultural area. The metropolitan center, on the other hand, provides a multiplicity of services and usually is the focal point of a specialized industrial or commercial activity, such as finance, manufacturing, or government. Medical, legal, financial, educational, and other services are grouped in the metropolitan center. They are also typically employment centers as a result of a concentration of manufacturing, government, or other activities.
>
> The immediate implication of the concept of regionalism for local government is that the region does not respect governmental boundaries. In Texas, a region is uniformly a multi-county entity. The regional council, therefore, is designed specifically for the purpose of providing solutions to transportation, public safety, health, housing, and other problems on a multi-agency basis. The issue related to organization of non-metropolitan councils as it pertains to the concept of regionalism involved how the State should encourage development of these agencies in a manner best suited to each Texas region's particular needs.[48]

The Official Memorandum issued by the Governor's Office on December 16, 1968, which created the COGs the Texas, set forth the following new policy:

> Before any new district or region assisted or to be assisted by the Federal government or the State of Texas may be formed in the State, and before any existing districts may be altered, the proposed district or district change shall be reviewed by the Governor. Approval shall be granted only if the district or region is in conformance with the State Planning Regions except where in the judgement of the Governor there is clear justification for failure to conform to these regions.[49]

The preceding, then, was the legislative condition that Texas was in at the time that the President's Office of Management and Budget issued Circular No. A-95 on July 24, 1969.

Circular No. A-95 places into law a procedure for coordinating federal and federally assisted programs and projects with each other and with state, regional, and local plans and programs. CETA prime sponsors are required to direct their applications for federal funds through the A-95 Review process.

The Circular has two components: 1) the Circular itself, which is very brief; and 2) five Attachments. The Circular identifies the statutory authority upon which it is based, its primary objectives, and general provisions that apply to its several operative parts.[50]

Attachment A contains the operative requirements of the Circular, and defines key terms; most definitions are statutory. It has four major parts:

Part I: The "Project Notification and Review System" (PRNS) deals with state and local review of applications for federal assistance.

Part II: "Direct Federal Development" provides for consultation by federal agencies with state and local governments on direct federal development projects.

Part III: "State Plans" provides for gubnernatorial review of state plans required under certain federal formula grant programs.

Part IV: "Coordination of Planning in Multijurisdictional Areas" promotes coordination of federally assisted planning at the substate regional level.[51]

Attachment B contains the laws upon which the Circular is based: Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966, and Title IV of the Intergovernmental Cooperation Act of 1968.[52]

Attachment C contains the language of Section 102(2)(c) of the National Environmental Policy Act of 1969. The clearinghouse review system established under Part I of Attachment A is used on partial fulfillment of the Act. While A-95 Review is often cited as being based, in part, on the National Environmental Policy Act (NEPA); however, it is not, nor is it an extension of NEPA. It is simply a means by which to secure state and local inputs to NEPA as required by Section 102(2)(c) of that act.[53]

Attachment D identifies the federal domestic assistance programs covered by the Project Notification and Review System (PNRS). These are the many categorical programs listed in the Catalog of Federal Domestic Assistance, which is published by the President's Office of Management and Budget.[54]

Attachment E is Standard Form 424, which is used to inform clearinghouses of actions taken on projects they have reviewed. SF 424 may also be used, at the election of any clearinghouse, as the Notification of Intent (NOI).[55]

Circular No. A-95 represents

> . . . a response to the need for coordination of planning and development activities within and among federal, state, and local levels of government.
>
> At the federal level, there is a myriad of programs of assistance to state and local governments that were developed piecemeal and, taken as a whole, are not coherent as to policy and administration. They are often duplicative and sometimes even in conflict with each other.
>
> At the state level, governors' abilities to manage are not only often circumscribed by state constitutions, but administratively frustrated with respect to federal programs by functional bureaucracies.
>
> Local government is heavily fragmented both within and among jurisdictions.
>
> Within individual jurisdictions many federally assisted programs and projects cannot be planned without reference to programs and projects within other functional or jurisdictional areas.[56]

The A-95 Review process, enacted into law in 1969, complemented another Texas law, Article 4413(32a), passed in 1967 by the 60th Texas Legislature. This law, entitled "Interagency Planning Councils," designated the Governor as the "Chief Planning Officer of the State," and directed the Governor to

> . . . establish a Division of Planning Coordination within his Office to coordinate the activities of the several Councils, and to serve as a coordinating catalyst by encouraging needed studies and planning efforts.

It also directed the Governor to

> . . . appoint Interagency Planning Councils to coordinate joint planning efforts in the various functional areas of government, and each Council shall be composed of a member of the Governor's Office and the Administrative heads of the several State agencies and departments and institutions of higher education represented on the respective Councils. The Interagency Planning Councils shall represent the areas of natural resources, health, education, and such other areas as may require coordinated planning efforts.[58]

The newly created Division of Planning Coordination was to serve as

> . . . the State Clearinghouse on all state agency applications for federal grant or loan assistance, and shall be notified of all applications for federal grant or loan assistance prior to actual submission of such applications[59]

The DPC also had the power to provide for the "review and comment of all state plans of state agencies required as a condition for federal assistance and may provide for the review and comment on all state agency applications for grant or loan assistance."[60] DPC was ordered to "establish policies and guidelines for the effective review and comment on such state plans and applications for federal grant or loan assistance."[61]

The organization of the A-95 review process in Texas centers, functionally, around the Governor. In late 1969, faced with implementing Circular No. A-95 in Texas, the Governor designated DPC to serve as the State Clearinghouse, to conform with requirements of the new law. In addition, the role of areawide clearinghouses was assumed by the now 24 regional COGS authorized by Article 1011m, V.A.C.S., as amended.

The Texas Governor's Office distributed guidelines -- set forth on an interim basis -- for implementing A-95 review in Texas, making clear that these guidelines were scheduled to be revised or modified, if necessary, in January 1970. These guidelines, issued October 1, 1969, describe the implementation of the provisions of Circular No. A-95 in Texas as follows:

A. PURPOSE

> The Project Notification and Review System (PNRS) may be thought of as an 'early warning system' to facilitate coordination of State, regional and local planning and development. It represents an attempt to expedite the metropolitan review process established under Section 204 of the Demonstration Cities and Metropolitan Development Act of 1966 and to extend the process to non-metropolitan areas and to agencies of the State of Texas.

> The foundation of the PNRS process will be the establishment of a State clearinghouse and metropolitan and regional (non-metropolitan) clearinghouses, which will effect coordination of federally-assisted projects through review, comment, and information exchange. 62

This policy establishes state, metropolitan, and non-metropolitan clearinghouses. Metropolitan and non-metropolitan clearinghouse designation is given exclusively to regional councils (COGs) throughout the state.

The function of the metropolitan and non-metropolitan clearinghouses, and their relationship to the state, are described as follows:

D. GEOGRAPHIC AREA: PROJECT NOTIFICATION AND REVIEW:

The . . . State Planning Regions will serve as the geographic framework for the Project Notification and Review System . . .

1. PROJECT NOTIFICATION

a. Geographic Areas for Project Notification: All applicants for Federal assistance under programs listed in Appendix D [of the Guidelines] shall notify the metropolitan or regional (non-metropolitan) clearinghouse in the State Planning Region in which the project is to be located, regardless of affiliation with a regional council . . .

b. Joint Notification: In State Planning Regions in which there is both a metropolitan and a regional (non-metropolitan) clearinghouse, the applicant shall notify both clearinghouses concurrently.

c. Regions With No Clearinghouse: In State Planning Regions which have no designated clearinghouse, the applicant will notify the State Clearinghouse (Division of Planning Coordination, Office of the Governor).

2. PROJECT REVIEW:

a. Project review is required on projects to be located in counties which are members of a regional council or which form part of a Standard Metropolitan Statistical Area (SMSA). The State Clearinghouse and the metropolitan or regional (non-metropolitan) clearinghouse may determine projects in which there is no interest, even though the project is to be located in a member county of a regional council, or in an SMSA.

b. Project review is not required on projects which are to be located in non-member counties of a regional council. Project review is not required in non-metropolitan counties in a State Planning Region in which there is no designated regional (non-metropolitan) clearinghouse. Such reviews may be conducted at the option of the clearinghouse.

c. Joint Review: In State Planning Regions in which their is both a metropolitan and a regional (non-metropolitan) clearinghouse, the clearinghouse shall form a joint projects review committee, to coordinate the comments of both clearinghouses.

(1) Joint reviews shall be required when:

(a) Both clearinghouses express an interest, and/or

(b) One of the clearinghouses expresses an interest in reviewing a project which is to be located within the planning jurisdiction of the other clearinghouse.

(2) The State Clearinghouse will assist the concerned clearinghouses in establishing an approved joint project review committee.[63]

It should be noted that Article 4413(32a), Interagency Planning Councils, V.A.C.S., was amended in 1975 by H.B. 1172 during the Regular Session of the 64th Texas Legislature. The enactment of this bill added additional requirements upon the State Clearinghouse, state agencies and institutions beyond those required by the OMB Circular No. A-95.[64]

The DPC acted as the State Clearinghouse for A-95 review until February 1976, when

> . . . the executive emphasis shifted abruptly away from planning and coordination toward the Governor's budget preparation. This occurred through a mergering of the Governor's Division of Planning Coordination (DPC) and the Governor's Budget and Planning Office (BPO).[65]

A Budget and Planning Office (BPO) was created as a result of this merger.[66]

The Texas State Clearinghouse is currently a part of the Governor's Office of Budget and Planning, headquartered in the Sam Houston State Office Building in Austin. The Clearinghouse staff includes five planners, two administrative technicians, and two clerical assistants. One planner coordinates the overall

Clearinghouse operations. Each of the other four planners works in the following areas:

1. Health and Human Services
2. Criminal Justice
3. General Government
4. Natural Resources, the Environment and Transportation

The review of environmental impact statements (EISs) and negative declarations, which are given to applicants filing inaccurate data, are handled by the fifth planner. The primary responsibilities of the State Clearinghouse planners relate to Parts I and II of Attachment A of Circular A-95; that is, the review of applications for federal aid and state plans.

According to Circular No. A-95, the State Clearinghouse may review any application for funds from a program covered by the Circular. The areawide clearinghouses review only those applications which directly affect the areas they serve. The areawide clearinghouses have no formal authority to review state plans; however, the State Clearinghouse does attempt to include the areawide agencies as review participants for state plans.

Because of the large number of applications for federal funds generated in Texas, the State Clearinghouse has developed the following guidelines limiting state review to

1. State agency grant applications for federal funds.
2. State plans required to secure federal funding.
3. State or local grant applications which are innovative and might be transferred to other areas of the state.
4. Local grant applications that cover a geographic area crossing state planning region boundaries.
5. Local grant applications where the applicant is an areawide clearinghouse.
6. State grant applications for certain specific functional areas (e.g., the Texas Highway Commission has requested that all grant applications to the U.S. Department of Transportation's Urban Mass Transportation Administration be reviewed in order to keep the Commission up-to-date on new projects throughout the state)

All other projects covered by Circular A-95 are reviewed only by the appropriate areawide clearinghouse. Like the State Clearinghouse, each individual areawide clearinghouse is free to determine a policy on which applications to review and the procedures to be used in the review. As noted above, A-95 requires no review; it requires only the opportunity to review.[67]

As a means of institutionalizing ways to "improve the coordination between the State and its local governments and between the State and the federal government," the 62nd Texas Legislature passed the Intergovernmental Cooperation Act, Article 4413(32b), as an amendment to Article 4413(32a). Effective August 31, 1971, it established the Texas Advisory Commission on Intergovernmental Relations.[68] This Act was again amended in 1975 by the 64th Texas Legislature.[69]

Conceived of as a policy research body, the Commission was charged with the following duties:

1. Evaluate on a continuous basis the interrelationships among Texas local, State and federal government agencies and prepare studies and recommendations to improve the relationships.
2. Evaluate proposed and existing federal programs and assess their impact upon Texas.
3. Evaluate the State's role in assisting its political subdivisions to carry out public responsibilities and made recommendations for improvement.
4. Serve as a forum for the discussion and resolution of serious intergovernmental problems.
5. Encourage, and where appropriate, coordinate studies relating to intergovernmental relations conducted by universities, State, federal and local agencies, and other research oriented organizations.[70]

The Texas Intergovernmental Cooperation Act of 1971 can best be viewed as a complementary component of and enacted in response to, the Texas Interagency Cooperation Act, and the federal Intergovernmental Cooperation Act of 1968.

FOOTNOTES FOR PART III

[1]Non-Metropolitan Regional Organization in Texas, by Peat, Marwick, Mitchell & Co., prepared for the Division of Planning Coordination, Office of the Governor, State of Texas, Austin: Peat, Marwick, Mitchell & Co., 1969, p. I-2.

[2]PL 89-560 (1964 Amendments to the United States Housing Act of 1954).

[3]Ibid.

[4]op. cit., Peat, et al., p. I-2.

[5]Ray, James F., State Coordination of Local Planning and Development Organizations in Texas, unpublished master's degree report, LBJ School of Public Affairs, The University of Texas at Austin, August 1967, p. 33.

[6]Ibid.

[7]Ibid., p. 11.

[8]Ibid., p. 28

[9]Ibid., p. 4 and 5; also, p. 29 (see Figure 2).

[10]Saylor, Donald Dale, Employment and Economic Development: A Case Study in Interagency Coordination, unpublished master's degree report, LBJ School of Public Affairs, The University of Texas at Austin, May 1979, p. 138. The discussion of Economic Development Administration (EDA) programs is based on pages 138-42 of this report.

[11]op. cit., Ray, p. 4 and 5.

[12]Ibid.

[13]op. cit., Peat, et al., p. I-3.

[14]The Regional Planning Act of 1965 (Article 1011m, V.A.C.S.), 59th Texas Legislature, Section 3(a).

[15]Ibid., Section 4(d).

[16]Ibid., Section 6(a).

[17]Ibid., Section 1(D).

[18]Ibid., Section 1(E).

[19]Ibid., Section 4(d).

[20]Ibid., Section 3(b).

[21]Ibid., Section 8.

[22]Memorandum of the Governor, Office of the Governor, Austin, Texas, December 16, 1968, noted in op cit., Peat, et al., p. II-5 and II-6.

[23]Ibid.

[24]"The Planning Agency Council for Texas," Office of the Governor, Austin, Texas, 1966, p. 1.

[25]op. cit., Ray, p. 8.

[26]Ibid., p. 8 and 9; also, see "Planning Agency Council for Texas," in Planning Coordination: A Report to the 60th Legislature, Austin, 1967, p. 1-16.

[27]op. cit., Ray, p. 34-5.

[28]Ibid., p. 35.

[29]"Regional Councils in Texas," by Rob Boyd, Texas Association of Regional Councils, Austin: The Association, circa 1980, p. 1.

[30]op. cit., Ray, p. 56.

[31]Ibid., p. 57-8.

[32]op. cit., Peat, et al., p. I-7 and I-8.

[33]Ibid., p. I-7.

[34]The Intergovernmental Cooperation Act of 1968 (PL 90-577), and 1976 Amendments.

[35]Ibid.

[36]Ibid.

[37]Dixon, Ernest R., A Critical Analysis of the A-95 Review Process in Texas: Where Do We Go From Here?, unpublished master's report, Graduate Program in Community and Regional Planning, School of Architenture, The University of Texas at Austin, May 1978, p. 1.

[38]Federal Register, Part IV, January 13, 1976, entitled "Evaluation, Review and Coordination of Federal and Federally Assisted Programs and Projects."

[39]op. cit., Dixon, p. 2.

[40]Ibid.

[41]op. cit., Peat, et al., p. I-8.

[42]"Legislative History of PL 90-577," United States Congressional Administrative News, 90th Congress, p. 4221-2.

[43]op. cit., Dixon, p. 3.

[44]op. cit., Peat, et al., p. I-8.

[45]Preston, James D. and Guesman, Patricia B., The Development of Multi-County Regions in Texas, Department of Agricultural Economics and Rural Sociology, Texas A&M University, College Station, Texas, September 1971, p. 7; Texas Land Use: A Comprehensive Land Resource Management Study, prepared for the Division of Planning Coordination, Office of the Governor, by Research and Planning Consultants, Austin, Texas, 8 volumes and summary volume, Austin: Office of the Governor, 1973, summary volume, p. 19; and Article 1011m, V.A.C.S., as amended by S.B. 242, 62nd Texas Legislature.

[46]op. cit., Preston, p. 7.

[47]op. cit., Peat, et al., p. I-8 and I-9; and Article 1011m, V.A.C.S., as amended by S.B. 242, 62nd Texas Legislature.

[48]op. cit., Peat, et al., p. III-3 and III-4.

[49]"Establishment and Use of State Planning Regions," Official Memorandum, Office of the Governor, Austin, Texas, December 16, 1968.

[50]op. cit., Dixon, p. 4.

[51]Ibid., p. 4 and 5; also listed in Office of Management and Budget Circular No. A-95, July 24, 1969, p. 10-15.

[52]Ibid., p. 5.

[53]Vallejo, Luis, A Study of the Review and Comment Process, Governor's Budget and Planning Office, unpublished Independent Study Project, LBJ School of Public Affairs, The University of Texas at Austin, May 1977, p. 10.

[54]op. cit., Dixon, p. 5.

[55]"Federal Assistance to State and Local Governments — Fundamental Changes Needed," draft report, U.S. General Accounting Office, Washington: General Accounting Office, 1975, p. 1; also noted in op. cit., Dixon, p. 6.

[56]Ibid., p. 5-10; also noted in op. cit., Dixon, p. 6 and 7.

[57]Article 4413(32a), V.A.C.S., 60th Texas Legislature.

[58]Ibid., Section 3.

[59]Ibid., Section 4(b)(2).

[60]Ibid., Section 4(b)(3).

[61]Ibid., Section 4(b)(4).

[62]"Interim Policy on Implementation of Bureau of the Budget Circular A-95, to Include Section 201 and Title IV of the Intergovernmental Cooperation Act of 1968," Office of the Governor, Division of Planning Coordination, Austin, Texas, October 1, 1969; also noted in op. cit., Peat, et al., p. IV-6.

[63]op. cit., Peat, et al., p. IV-7 and IV-8.

[64] op. cit., Vallejo, p. 16.

[65] Dufour, Eugene Generes, Communication, Cooperation & Coordination: The Solution to the Welfare Dilemma, privately published, Austin, Texas: E. Generes Dufour, 7508 Cross Draw Drive, Austin, Texas 78731, February 1981, p. 8.

[66] Ibid.

[67] Performance Report, Recommendations of the Legislative Budget Board Program Evaluation Staff of the 63rd Legislature, January 1975, Texas Legislature; noted in op. cit., Dixon, p. 10-11. Also, Governor's Office of Budget and Planning, July 1981.

[68] The Intergovernmental Cooperation Act of 1971, Article 4413(32b), V.A.C.S., 62nd Texas Legislature.

[69] Ibid.

[70] Ibid., Section 10.

PART IV: THE EXTENT OF COORDINATING JOB TRAINING IN TEXAS

In Texas, the responsiblity for job training is shared among many program deliverers. No central agency assumes responsibility for making sure all citizens have access to job preparation at strategic times in their lives; instead, several agencies perform certain functions, usually prompted by federal legislation, in cooperation with states. This network is more like a patchwork with no single agency assuming a coordinating role to address policy issues regarding job training. The range of job training available, quality of programs, cost-effectiveness of programs, and long-range planning are goals addressed by several agencies, but no cohesive plan exists in which the various agencies have come together to plan, implement, and evaluate together.

The concept of coordination as defined in A Special Report of the National Commission for Manpower Policy identifies the difficulty of translating the goal of better coordinated manpower programs into an operational reality. It states:

> The fragmentation of this nation's manpower effort originates in the authorizing legislation and extends through the delivery of services at the local level. A complex array of laws, agencies and levels of government are involved in attempting to improve the employability and economic well-being of segments of our population. However, the fragmentation of basic policies, programs and administrative structures hinder the overall effectiveness of these efforts.

Unless the concept and scope of coordination is properly understood, there is a strong possiblity of overestimating its potential to increase program effectiveness and an equally great potential to fail to realize the performance improvements that manpower coordination can yield.

Conceptually, coordination is the process of identifying the common goals and objectives among the various pieces of manpower legislation and several manpower-related programs. Then, having identified the areas of common purpose, the process continues to interrelating the mix and delivery of services toward these common objectives without sacrificing individual program goals or requirements. In general, the coordination of manpower and related programs should be pursued where it will result in improved services or an increased benefit from the resources available.

It is meaningful to elucidate the processes of coordination of these programs in Texas at both the state and local levels.

At the state level, responsibility for coordinating job training programs is handled by a complex system of separate advisory bodies or councils. This system consists of cross-memberships of agency and institutional leaders. For example, representatives of the Texas Education Agency appear on the membership lists of several of these advisory bodies, as do representatives of the Texas Employment Commission, the Texas Rehabilitation Commission, and the Coordinating Board, Texas College and University System, to name just a few.

This section of the report identifies and describes the following advisory bodies or councils:

- State Employment and Training Council (SETC)
- Advisory Council for Technical-Vocational Education in Texas (ACTVE)
- Texas Governor's Committee on Employment of the Handicapped
- Texas Employment Commission Advisory Council
- Texas Coordinating Commission for State Health and Welfare Services
- Texas State Occupational Information Committee (SOICC), Technical Steering (Advisory) Group

- 1202 Advisory Committee
- Educational Information Centers Program Technical Review Panel

In Texas at the local level, coordination is achieved by key people, such as counselors, who have access to resources which are made available within the community. The following agencies whose personnel achieve coordination in this fashion are:

- Texas Employment Commission
- Texas Rehabilitation Commission
- Texas Education Agency
- Texas State Commission for the Blind
- Texas Department of Human Resources
- Texas Department of Mental Health and Mental Retardation

A brief discussion of some of the efforts of these agencies, as well as maps of their respective service delivery areas, are included in this report.

The following list provides examples of how cross-membership within separate advisory bodies, or councils, form an elaborate system of networking:

- STATE EMPLOYMENT AND TRAINING COUNCIL (SETC)

  Members: Texas Education Agency
  Texas Employment Commission
  Texas Rehabilitation Commission
  Advisory Council for Technical-Vocational Education in Texas
  Texas Department of Human Resources
  Disabled Americans Veterans Committee
  Representatives chosen from units of local government, including those which are prime sponsors; from organized labor; business and agriculture; and representatives from the CETA eligible population.

  Legal Authority: Section 110, Title II, Comprehensive Employment and Training Act Amendments of 1978.

Function: As an independent advisory body appointed by the Governor, SETC's responsibilities include the continuous review of programs operated by each prime sponsor; review of plans developed by all state agencies providing employment, training and related services; and providing comments and recommendations to the Governor, the state agencies, and appropriate federal agencies on the relevancy and effectiveness of employment and training and related services systems in Texas.

- THE ADVISORY COUNCIL FOR TECHNICAL-VOCATIONAL EDUCATION IN TEXAS (ACTVE)

Members:
State Employment and Training Council
Vocational Education training institutions
Vocational students, teachers, management and guidance personnel
Non-profit private schools
Independent school district administrators
Local school boards
Senior Colleges
Postsecondary colleges
Local employment and training institutions
Employment and training programs for women
Industrial and economic development agencies
Correctional institutions
Job placement institutions
Community Education institutions
Physically and mentally handicapped
Disadvantaged persons
Labor
Business
Agricultural needs and problems
Adult Basic Education
General Public

Legal Authority: Vocational Education Amendments of 1968 (PL 90-576), reconstituted under Chapter 31 of the Texas Education Code.

Function: The ACTVE is federally mandated to evaluate vocational education programs, services and activities under the Annual Program Plan for Vocational Education. In this capacity, the ACTVE consults with the SETC in identifying vocational education and employment and training needs of the state. It also assesses the extent that vocational education, employment and training, vocational rehabilitation, and other programs give a consistent, integrated and coordinated approach in meeting needs.

- TEXAS GOVERNOR'S COMMITTEE ON EMPLOYMENT OF THE HANDICAPPED

  Administrative Agency: Texas Rehabilitation Commission

  Members: Texas Rehabilitation Commission
  Texas Employment Commission
  Texas Commission for the Blind
  Fifteen members, appointed by the Governor, representing handicapped persons, disabled veterans, and professionals in law, education and rehabilitation. Approximately half of these members are themselves disabled persons.

  Legal Authority: Article 4447c, V.A.C.S., (1959, as amended)

  Function: The Committee has worked, since 1949, with the President's Committee on Employment of the Handicapped, and with state agencies, employers, rehabilitation facilities and individuals, to promote employment of handicapped persons in Texas. The Committee's single purpose is to carry on a continuing program to promote employment of handicapped persons in Texas.

- TEXAS EMPLOYMENT COMMISSION ADVISORY COUNCIL

  Administrative Agency: Texas Employment Commission

  Members: Three commissioners from other agencies are appointed by the Governor for six-year overlapping terms
  Nine public representatives
  Nine employee representatives
  Nine employer representatives
  Two officers

  Legal Authority: Texas Unemployment and Compensation Act

  Function: Acts as an advisory body to the Texas Employment Commission.

- TEXAS COORDINATING COMMISSION FOR STATE HEALTH AND WELFARE SERVICES

  Members: Texas Department of Health
  Texas Health Facilities Commission
  Texas Education Agency
  Texas Department of Mental Health and Mental Retardation
  Texas Employment Commission
  Texas Department of Human Resources
  Texas State Commission for the Blind
  Texas Youth Council
  Executive heads of other health-related state agencies appointed by the Governor who serve as ex-officio members

Three members of the House appointed by the Speaker
Three members of the Senate appointed by the
Lieutenant Governor
Three citizens appointed by the Governor

Legal Authority: Article 4447c, V.A.C.S., (1959 as amended)

Function: Whenever any state agency or institution applies for a federal grant for health purposes, it must first provide the commission with a copy of the application. When an agency is thereafter funded, it must report to the commission and advice of the disposition of the funds.

- TEXAS STATE OCCUPATIONAL INFORMATION COORDINATING COMMITTEE (SOICC), TECHNICAL STEERING (ADVISORY) GROUP

Members: State Employment and Training Council
Coordinating Board, Texas College and University System
Texas Rehabilitation Commission
Texas Education Agency
Texas Employment Commission

Legal Authority: Education Amendments of 1976 (PL 94-482) and CETA, as amended by the Youth Employment and Demonstration Projects Act of 1977 (PL 95-93).

Function: To improve coordination and cooperation among its five member agencies in collecting and disseminating occupational information. Its purposes include: increasing awareness of availablility of occupational information and to identify data needs; standardizing occupational data terminology and definitions for all state agencies and organizations; providing a forum for interaction between data developers and data users; developing and implementing an occupational system for Texas which will have the information needed by all occupational users readily available; and identifying and filling occupational data gaps.

- 1202 ADVISORY COMMITTEE

Administrative Agency: Coordinating Board, Texas College and University System

Members: Texas Education Agency
Advisory Council for Technical-Vocational Education in Texas
Texas Employment Commission
Council of Presidents, State Senior Colleges
Independent Colleges and Universities of Texas, Inc.
Texas Association of Private Schools

Texas State Technical Institute
Texas Public Junior College Association
Texas Student Association

Legal Authority: 1976 Amendment to the Higher Education Act

Function: Advisory body to the Coordinating Board

- EDUCATIONAL INFORMATION CENTERS PROGRAM TECHNICAL REVIEW PANEL

Administrative Agency: Coordinating Board, Texas College and University System

Members: Texas Department of Community Affairs
Texas Department of Human Resources
State Occupational Information Coordinating Committee
Advisory Council for Technical-Vocational Education in Texas
Independent Colleges and Universities of Texas, Inc.
Texas Rehabilitation Commission
Adult Education Cooperatives
Region XIX, Education Service Center
Career Information Communications Center
Continuing Education
Minnie Stevens Piper Foundation
Texas Student Association
Texas Association of Private Schools
Texas Association of Student Financial Aid Directors
Southwest Educational Development Laboratory
Members of technical colleges and universities
Members of junior colleges

Legal Authority: Education Amendments of 1976 (PL 94-482)

Function: Dissemination of educational information to the various state agencies as well as to the public. The panel contributes data and information for the publication of the Texas Educational Opportunity Guide: Vital Information for Education & Work.

At the state level, cross-membership by agency personnel on various committees presents the opportunity for exchange of information, data and resources. While such cross-membership acts as a formal mechanism for getting key representatives from state agencies and other organizations together, the intertwining of these multiple relationships form a vast and complicated network. The channel of communication which provide

occupational and educational information pertaining to employment and training services are kept active through a series of publications issued by various agencies and their advisory bodies.

In its capacity as the State 1202 Commission, the Coordinating Board, Texas College and University System, completed the fourth in a series of reports relating to employment opportunities for graduates of Texas postsecondary educational programs. The 243-page Postsecondary Educational Supply and Occupational Demand in Texas, Spring 1981, was prepared by the Postsecondary Educational Planning Office, under the directorship of John Cobb. The report's purpose is

> . . . to provide information on the relation between the output of postsecondary education in Texas and career ooportunities in the job market. Specifically, it is the intent of the report to identify those vocational and academic programs which are overproducing, underproducing, or in balance relative to occupational openings in the state.

A summary of short-term employment opportunities (for 1981-82) and average annual salaries for 1980 graduates has also been published. Distribution of 100,000 copies of this pamphlet has been made to school counselors and the public.

A 30-page document, Texas Educational Opportunity Guide, is also published by Cobb's office. A coordination of efforts from both the 1202 Commission and the Educational Information Centers Technical Review Panel members and consultants has produced a comprehensive list of state resources for job opportunities. Contained in the Guide is information relating to the numerous resources for postsecondary educational opportunities, including names and addresses of educational institutions, state agencies, private agencies and federal manpower programs in Texas. Also provided are the support services available throughout Texas. Lists of individual programs within 14 broad educational areas of study are

included along with alternative occupational choices that are directly or closely related to each of the vocational or academic programs. The Guide is distributed to places throughout the state where persons without access to such information may utilize them.

Another source of occupational information is the State Occupational Information Coordinating Committee (SOICC). The SOICC is made up of five state agencies, as previously noted. These agencies have banded together to coordinate their efforts in collecting and disseminating occupational information. The Texas SOICC evolved out of the Education Amendments of 1976 and CETA, as amended by the Youth Employment and Demonstration Projects Act of 1977. Both of these laws called for creating a National Occupational Information Coordinating Committee (NOICC), as well as a SOICC for each state. Texas established its own SOICC as a result of this legislation, and in accordance with an agreement with NOICC.

Two recent Texas SOICC publications, A Guide to Career and Occupational Information, and the Directory of Licensed Occupations and Apprenticeship Programs, give information about occupations currently available as well as the training and licensing requirements for these occupations. The latest edition of the SOICC Guide includes occupational information from non-SOICC agencies such as the Texas Merit System Council; the Texas Department of Human Resources; the Texas Hospital Association; the TEX-SIS (Student Information Follow-Up System for the state's junior colleges); and the Advisory Council for Technical-Vocational Education in Texas.

The Directory, published in September 1980, lists 43 occupations requiring a certificate or license in Texas. Information about apprentice training programs in Texas are also included.

The Texas SOICC also awards research contracts to both public and

private organizations to study the various facets of occupational information.

As previously discussed, coordination at the local level is achieved by key people, such as counselors, who have access to resources that are made available to people within local communities. The following agencies administering programs of job training and related support services achieve coordination at the local level:

- TEXAS EMPLOYMENT COMMISSION

An example of how interagency coordination is achieved at the local level is the Work Incentive Program (WIN). WIN is operated jointly by the Texas Employment Commission (TEC) and the Texas Department of Human Resources (TDHR) in the following counties: Bexar, Dallas, El Paso, Harris, Hidlago-Cameron-Willacy (a multi-county project), Jefferson, McLennan, Nueces, Tarrant, and Travis.

The WIN program provides vocational counseling, institutional training, orientation to work, work experience situations, job information, assistance in looking for work, and placement services. Subsidized employment expected to lead to regular employment is available through WIN on-the-job training (OJT) and Public Service Employment (PSE) subcontracts, and through Public Service jobs through CETA. WIN is a federal program and from October 1, 1979, through July 31, 1980, a total of 20,647 individuals registered for the program. Of these, nearly 7,300 entered unsubsidized employment and another 800 were placed in suspense status for training or subsidized employment through other programs. The goal of the WIN program is to help employable persons receiving Aid to Families with Dependent Children (AFDC) move from welfare rolls to economic independence.

Nearly 150 full service local TEC and WIN offices operate efficient employment service programs which help individuals find employment and

furnish employers with employees and personnel services. The legislation creating the TEC mandates that it provide free placement services for individuals in need of them.

A map depicting the WIN program offices, and a list of the cities in which these offices are headquartered, is shown on the following pages. Also, a map depicting the service areas of TEC, and a list of the cities in which its District Offices are located, is included.

• TEXAS REHABILITATION COMMISSION

Another example of how coordination is achieved through direct relationships of interagency counselors is the way in which the Texas Rehabilitation Commission (TRC) serves its clients.

The TRC's Vocational Rehabilitation Division is dedicated to helping handicapped persons, who have a wide range of physical and mental disabilities, get and keep jobs. To be eligible for TRC services a person must meet two requirements: 1) have a physical or mental disability which results in a substantial handicap in getting and/or keeping a job; and 2) Vocational Rehabilitation services may reasonably be expected to help a person get and keep a job.

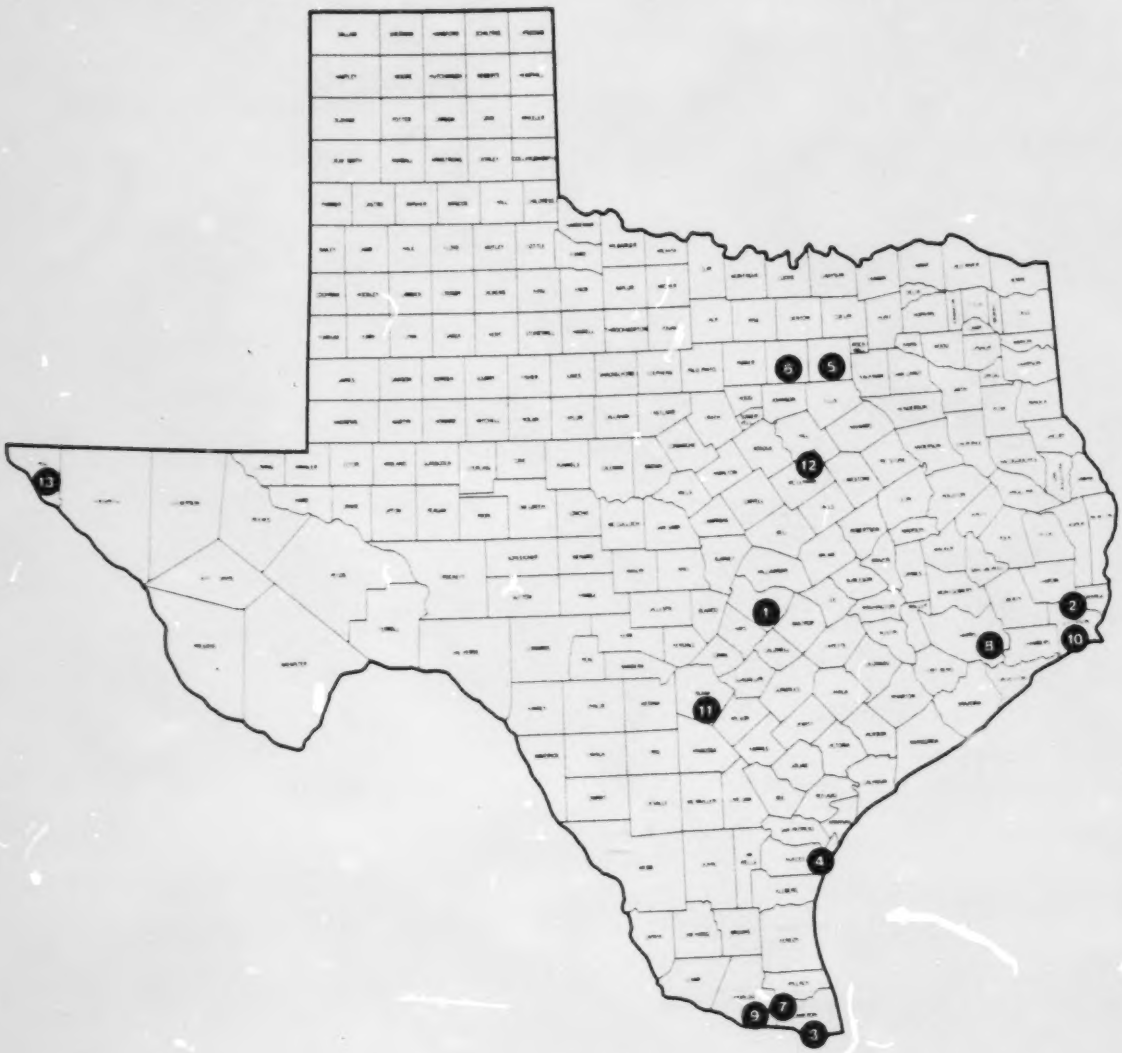
The TRC counselor is the prime linkage between the TRC and other agencies throughout Texas. One of the main thrusts of a counselor's job is to obtain a proper placement in the work world for the individual, and to provide effective and efficient vocational rehabilitation services. Therefore, Interaction between counselors and other agencies concerned with job placement is important.

Each field office of the TRC has one job counselor skilled in placement of disabled persons. TRC counselors deal routinely with such personnel in

FIGURE 11

TEXAS EMPLOYMENT COMMISSION

Work Incentive (WIN) Program Offices



SOURCE: Texas Employment Commission, Austin, Texas, June 1981.

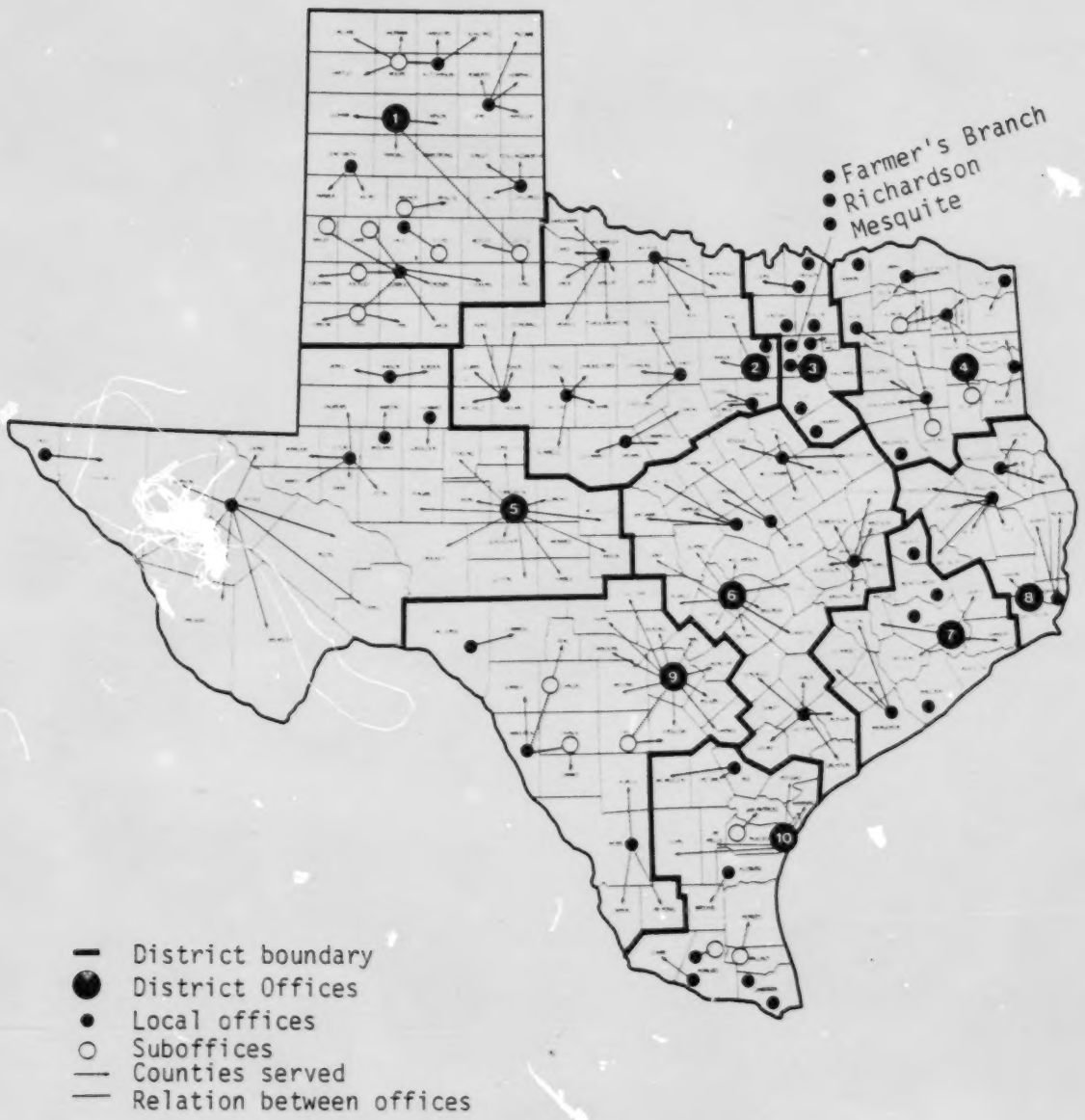
TEXAS EMPLOYMENT COMMISSION
Work Incentive (WIN) Program Offices

1. Austin
2. Beaumont
3. Brownsville
4. Corpus Christi
5. Dallas
6. Fort Worth
7. Harlingen
8. Houston
9. McAllen
10. Port Arthur
11. San Antonio
12. Waco
13. El Paso

SOURCE: Texas Employment Commission, Austin, Texas, June 1981.

FIGURE 12

Texas Employment Commission Service Areas



SOURCE: Texas Employment Commission, Austin, Texas, June 1981.

Texas Employment Commission District Offices

1. Amarillo
2. Fort Worth
3. Dallas
4. Longview
5. San Angelo
6. Austin
7. Houston
8. Beaumont
9. San Antonio
10. Corpus Christi

SOURCE: Texas Employment Commission, Austin, Texas, June 1981

both referral to the Texas Employment Commission and accepting Texas Employment Commission referrals of disabled persons who may require additional training or rehabilitation.

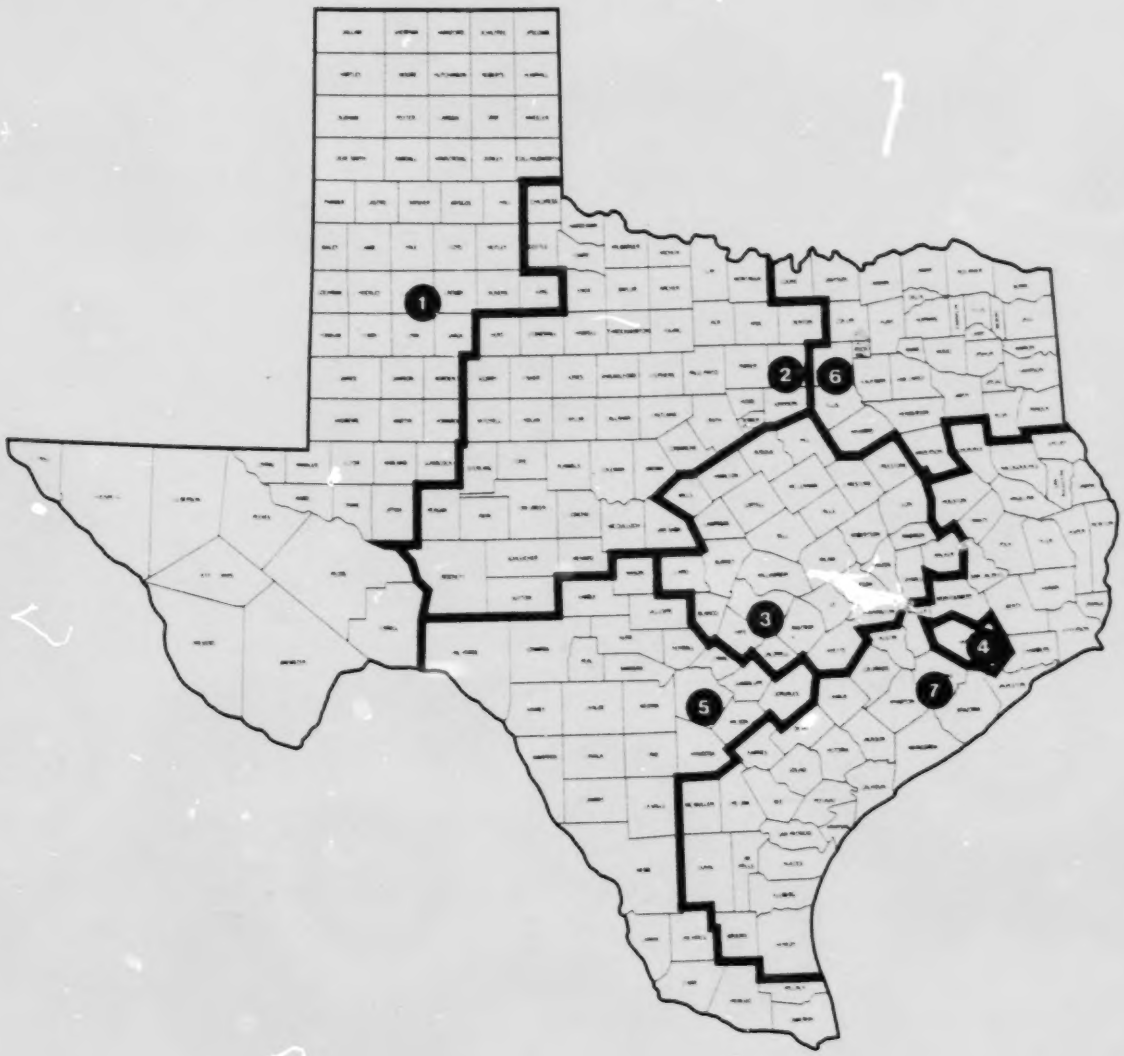
Another example of formal, state-wide and local linkage of TRC with other agencies involves TRC counselors who are assigned to both secondary and postsecondary campuses to assist disabled persons toward ultimate job placement. These counselors are located at the major postsecondary campuses in Texas. The remaining campuses are served by "courtesy" counselors who carry a caseload of other than disabled students as the primary counseling effort. These persons assist schools as needed. In addition, direct input is provided by TRC into the curriculum design and development of postsecondary job readiness clinics. There are currently three, which are located at the University of Texas at Austin, Southwest Texas State University, and the Richland Campus of the Dallas Community College System. There is also one special two-year job readiness program for the very severely disabled at the Gonzales Junior College campus.

The TRC maintains a state coordinator program for the employment of the handicapped. Each state agency has assigned one person to oversee that agency's program of hiring disabled persons. TRC also provides grants under certain circumstances to non-profit organizations such as Goodwill Industries, and halfway houses, to assist the disabled in moving toward full and independent employment.

The service areas of the Texas Rehabilitation Commission, and the cities in which their Regional Offices are located, are depicted and listed on the following pages.

FIGURE 13

Texas Rehabilitation Commission Service Areas



SOURCE: Texas Rehabilitation Commission, Austin, Texas, June 1981.

Regional Offices of the Texas Rehabilitation Commission

1. Lubbock
2. Fort Worth
3. Austin
4. Houston
5. San Antonio
6. Dallas
7. Sugarland

SOURCE: Texas Rehabilitation Commission, Austin, Texas, June 1981.

• TEXAS EDUCATION AGENCY

The interaction between the Texas Education Agency (TEA) and other state agencies relating to job training programs involve two special programs: the Texas Industrial Start-Up Training Program, and TEA's linkage with CETA.

The Texas Industrial Start-Up Training Program is a cooperative activity between the Texas Industrial Commission, Texas Employment Commission, TEA, a training agency, and a new Texas industry designed specifically to help meet the immediate work force needs of industries considering plant location in Texas. Designed to be flexible and readily tailored to the particular needs of the incoming industry, the program has access to all of the occupational facilities of Texas' 67 junior and community colleges, the four campuses of the Texas State Technical Institution, the state's independent school districts, and some senior colleges.

Functionally, the Industrial Start-Up Training Program consists of five basic stages:

1. Analyzing and identifying the firm's immediate "start-up" labor force requirements.
2. Designating the training insitution and designing the training program.
3. Initially recruiting and screening the potential work force.
4. Implementing the training program.
5. Monitoring the program to ensure accomplishment of desired results.

TEA emphasizes that Industrial Start-Up Programs should be viewed as supplemental to other state-sponsored occupational training programs because they are essentially "short-term crash programs" and should not compete with regular available vocational-technical education programs.

The second special program involving coordination is TEA's linkage with CETA. TEA's linkage with CETA in Texas involves coordinating with prime sponsors and funding agreements with local education agencies, in cooperation with the Texas Department of Community Affairs. These occupational training funds are a significant portion of the Governor's Discretionary Grants provided under CETA. In Texas the principle of local autonomy prevails. Participation in these programs and other linkages are up to local schools. However, the statement of assurances in the Annual Application for Federally Funded Vocational Education Programs contains several statements relating to consultation with others. Assurance D states:

> The planning and development of the vocational education programs proposed in this application have been coordinated with the prime sponsor of the Comprehensive Employment and Training Act programs in the area (if any) to assure a coordinated approach in meeting the needs of the area or community.

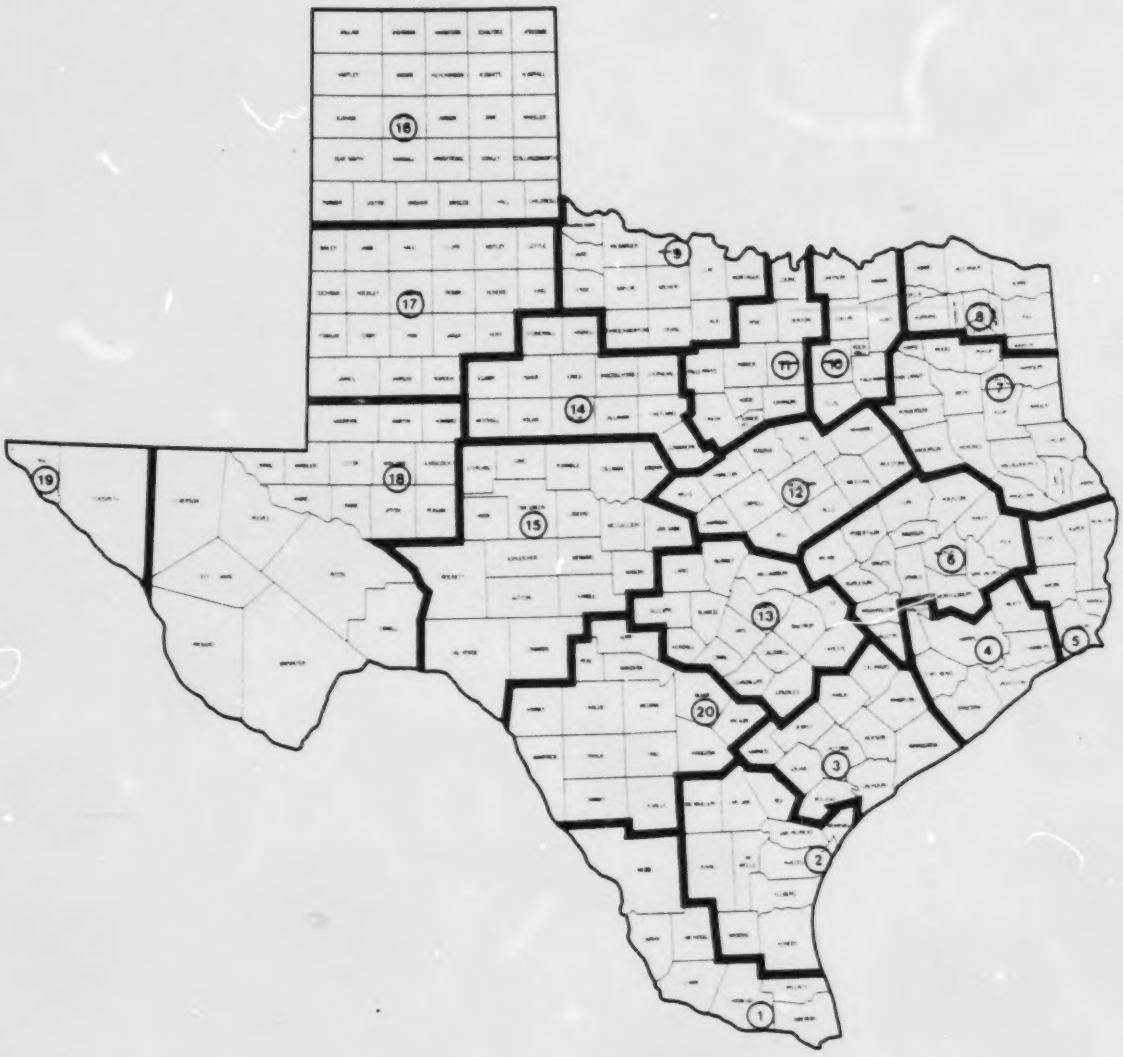
The service areas of the Texas Education Agency are depicted on the following page. These are 20 areas in Texas, each having a Regional Education Service Center. A list of the cities in which these centers are located also is included. Although the official service areas of TEA are these 20 Regional Education Service Centers, several other service areas have been utilized for planning and other administrative purposes. These areas are:

- Service Areas of Adult Education Cooperatives
- Adult Education Area Consultants' Service Areas
- Distributive Education Area Supervisors' Service Areas
- Vocational Industrial Education Consultants' Service Areas
- Vocational Office Education Consultants' Service Areas
- Homemaking Education Consultants' Service Areas
- Vocational Agricultural Education Supervisors' Service Areas

FIGURE 14

TEXAS EDUCATION AGENCY

Regional Education Service Centers' Service Areas



SOURCE: Texas Education Agency, Austin, Texas, June 1981.

TEXAS EDUCATION AGENCY

Offices of Regional Education Service Centers

1. Edinburg
2. Corpus Christi
3. Victoria
4. Houston
5. Beaumont
6. Huntsville
7. Kilgore
8. Mt. Pleasant
9. Wichita Falls
10. Richardson
11. Fort Worth
12. Waco
13. Austin
14. Abilene
15. San Angelo
16. Amarillo
17. Lubbock
18. Midland
19. El Paso
20. San Antonio

SOURCE: Texas Education Agency, Austin, Texas, June 1981.

FIGURE 15

TEXAS EDUCATION AGENCY

Service Areas of Adult Education Cooperatives

SOURCE: Texas Education Agency, Austin, Texas, October 1980.

TEXAS EDUCATION AGENCY

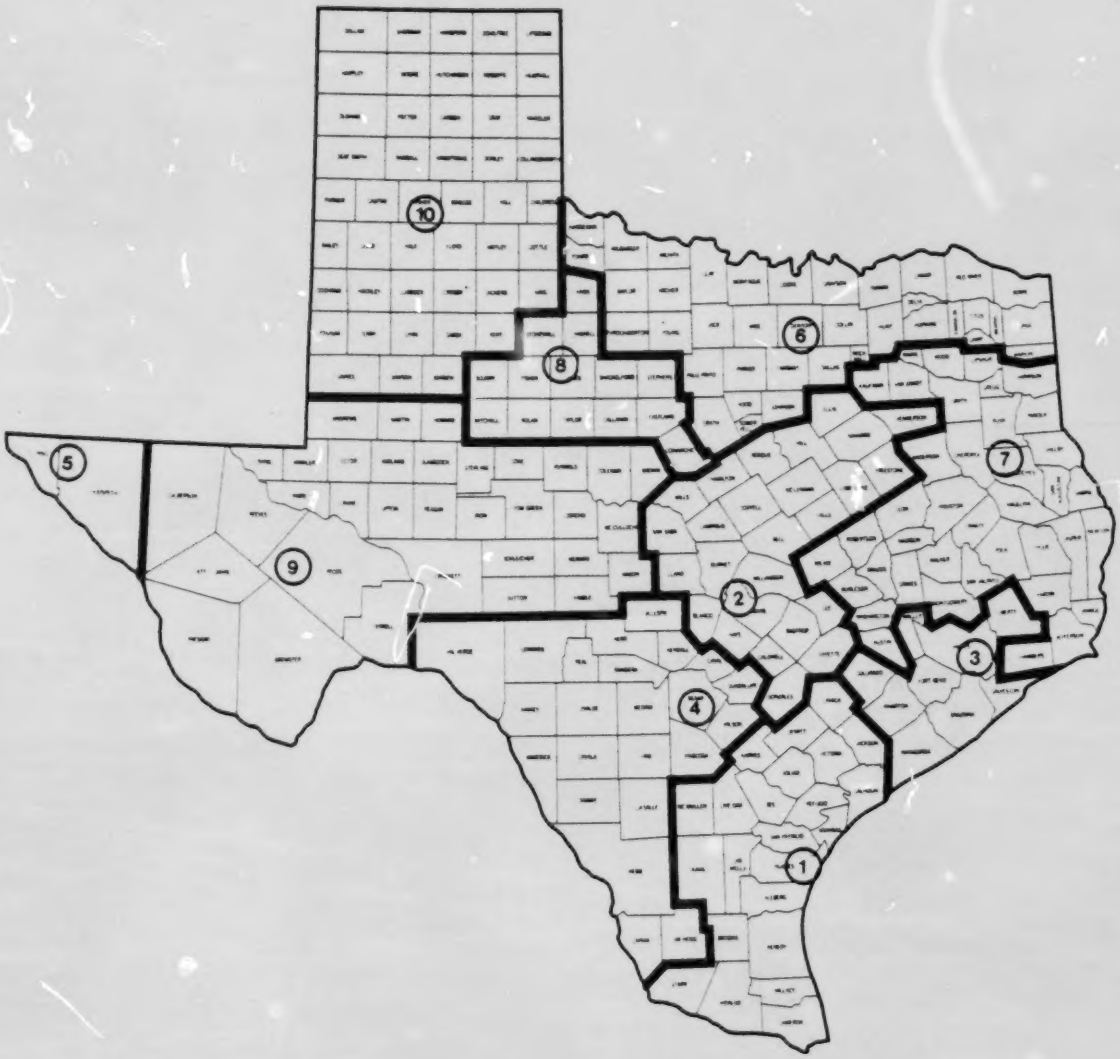
Prime Sponsors of Adult Education Cooperatives

1. Abilene ISD
2. Alice ISD
3. Austin Community College
4. Beaumont ISD
5. Beeville ISD
6. Brownsville ISD
7. Central Texas College
8. College of the Mainland
9. Comal ISD
10. Corpus Christi ISD
11. Corsicana ISD
12. Crockett ISD
13. Dallas ISD
14. El Paso ISD
15. Fort Worth ISD
17. Harris Co. Department of Education (excluding Houston ISD)
18. Henderson County Junior College
19. Houston Community College (only Houston ISD)
20. Howard College
21. Jasper ISD
22. Laredo Junior College
23. Lubbock ISD
24. McAllen ISD
25. Midland College
26. Mount Pleasant ISD
27. Odessa College
28. Palestine ISD
29. Plainview ISD
30. Port Arthur ISD (only Port Arthur)
31. Region 1 ESC - Edinburg
32. Region 3 ESC - Victoria
33. Region 4 ESC - Houston
34. Region 6 ESC - Huntsville
35. Region 7 ESC - Kilgore
36. Region 9 ESC - Wichita Falls
37. Region 11 ESC - Waco
38. Region 16 ESC - Amarillo
39. Region 17 ESC - Lubbock
40. Region 20 ESC - San Antonio
41. Rusk ISD
42. San Angelo ISD
43. Sherman ISD
44. Smithville ISD
45. Southwest Texas Junior College
46. Sweetwater ISD
47. Texarkana ISD
48. Valley View ISD
49. Wharton County Junior College

SOURCE: Texas Education Agency, Austin, Texas, October 1980.

FIGURE 16

TEXAS EDUCATION AGENCY
Adult Education Area Consultants' Service Areas



SOURCE: Texas Education Agency, Austin, Texas, June 1981.

TEXAS EDUCATION AGENCY

Offices of Adult Education Area Consultants*

1. Corpus Christi
2. Austin
3. Houston
4. San Antonio
5. San Antonio
6. Denton
7. Austin
8. Austin
9. Austin
10. Austin

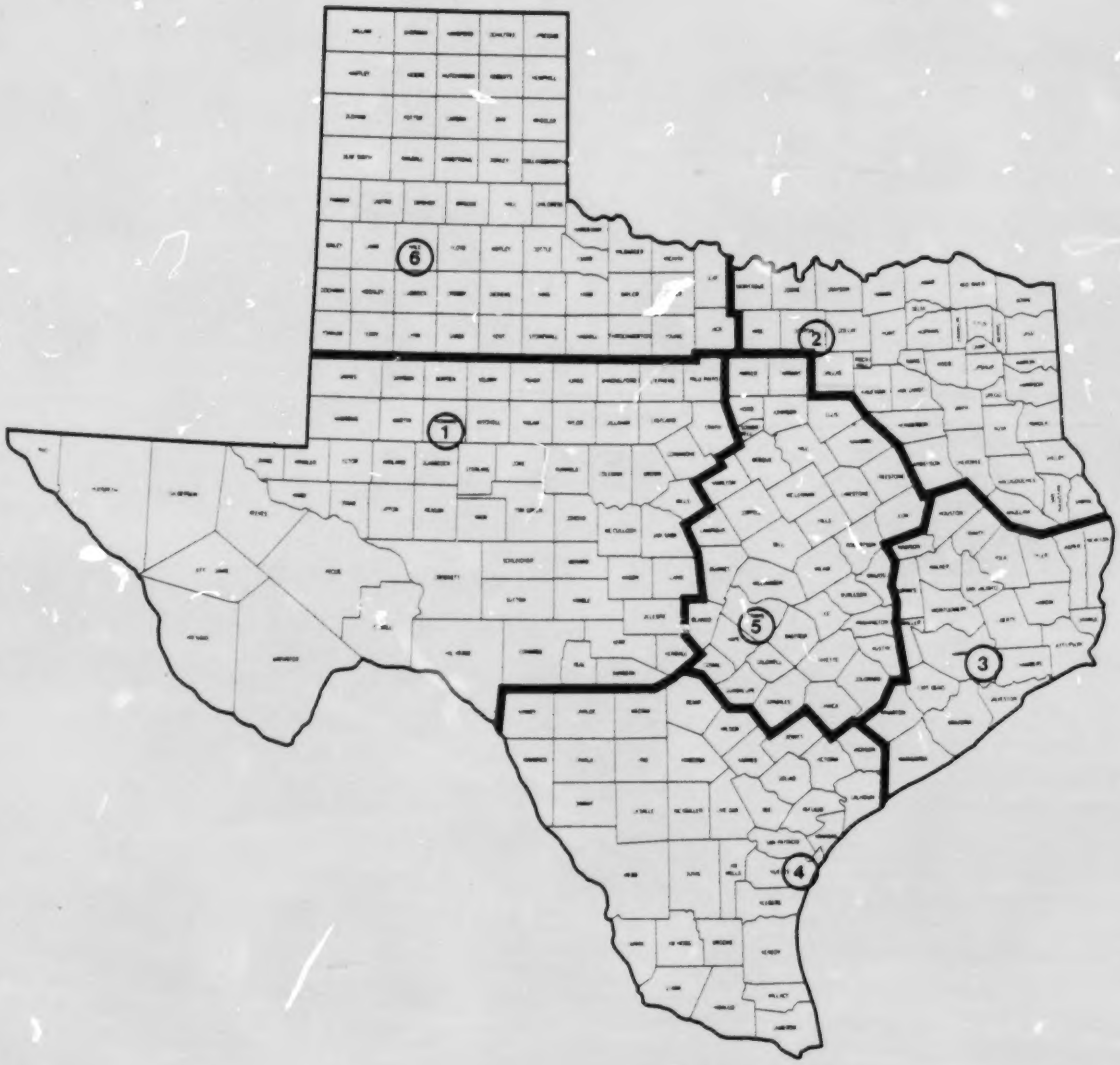
*Note that some Areas are served by personnel in Austin.

SOURCE: Texas Education Agency, Austin, Texas, June 1981.

FIGURE 17

TEXAS EDUCATION AGENCY

Distributive Education Area Supervisors' Service Areas



SOURCE: Texas Education Agency, Austin, Texas, June 1981.

TEXAS EDUCATION AGENCY

Offices of Distributive Education Area Supervisors

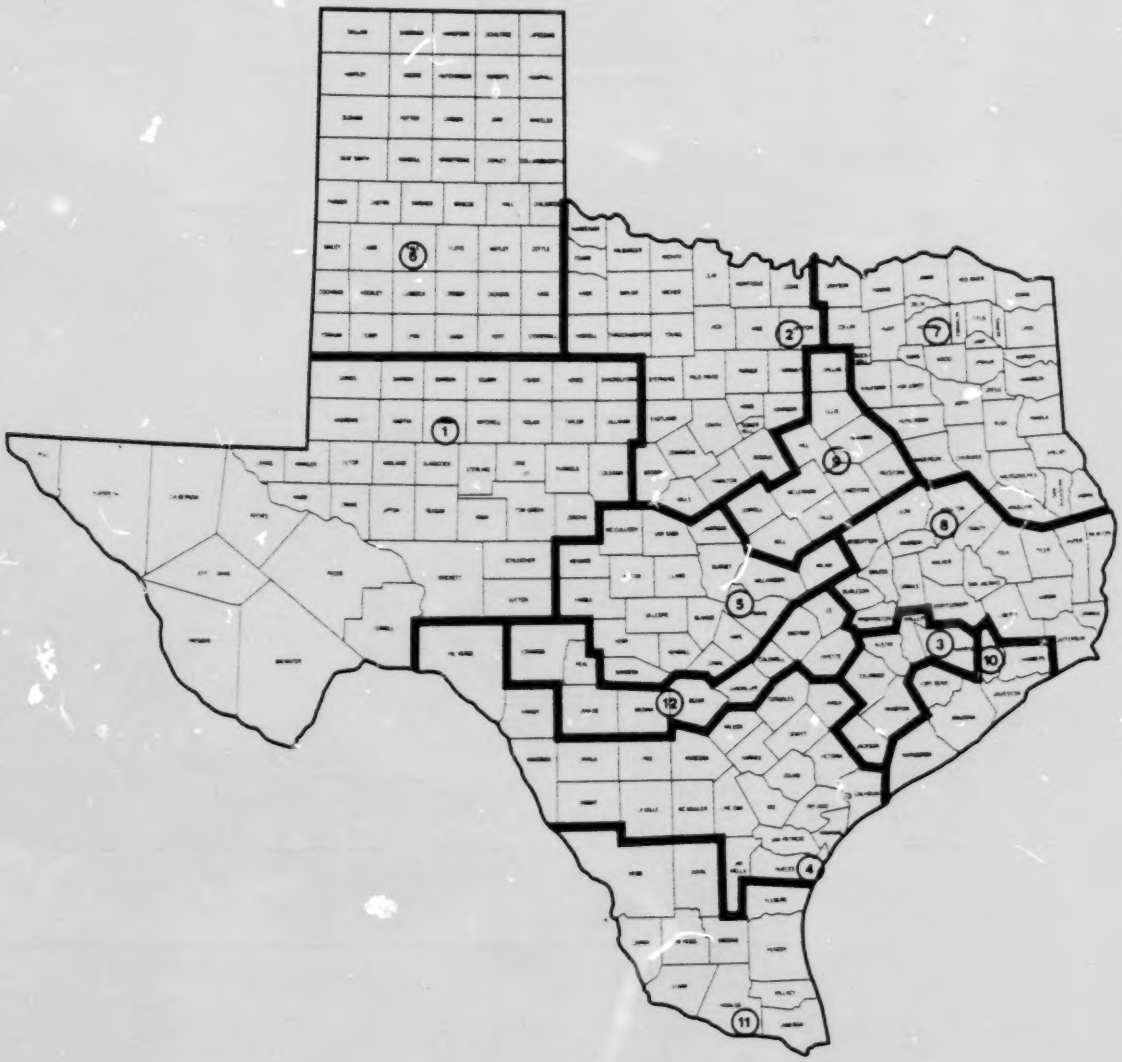
1. Big Spring
2. Denton
3. Houston
4. Corpus Christi
5. Austin
6. Plainview

SOURCE: Texas Education Agency, Austin, Texas, June 1981.

FIGURE 18

TEXAS EDUCATION AGENCY

Vocational Industrial Education Consultants' Service Areas



SOURCE: Texas Education Agency, Austin, Texas, June 1981.

TEXAS EDUCATION AGENCY

Offices of Vocational Industrial Education Consultants*

1. Big Spring
2. Denton
3. Houston
4. Corpus Christi
5. Austin
6. Plainview
7. Sulphur Springs
8. Crockett
9. Denton
10. Houston
11. McAllen
12. Austin

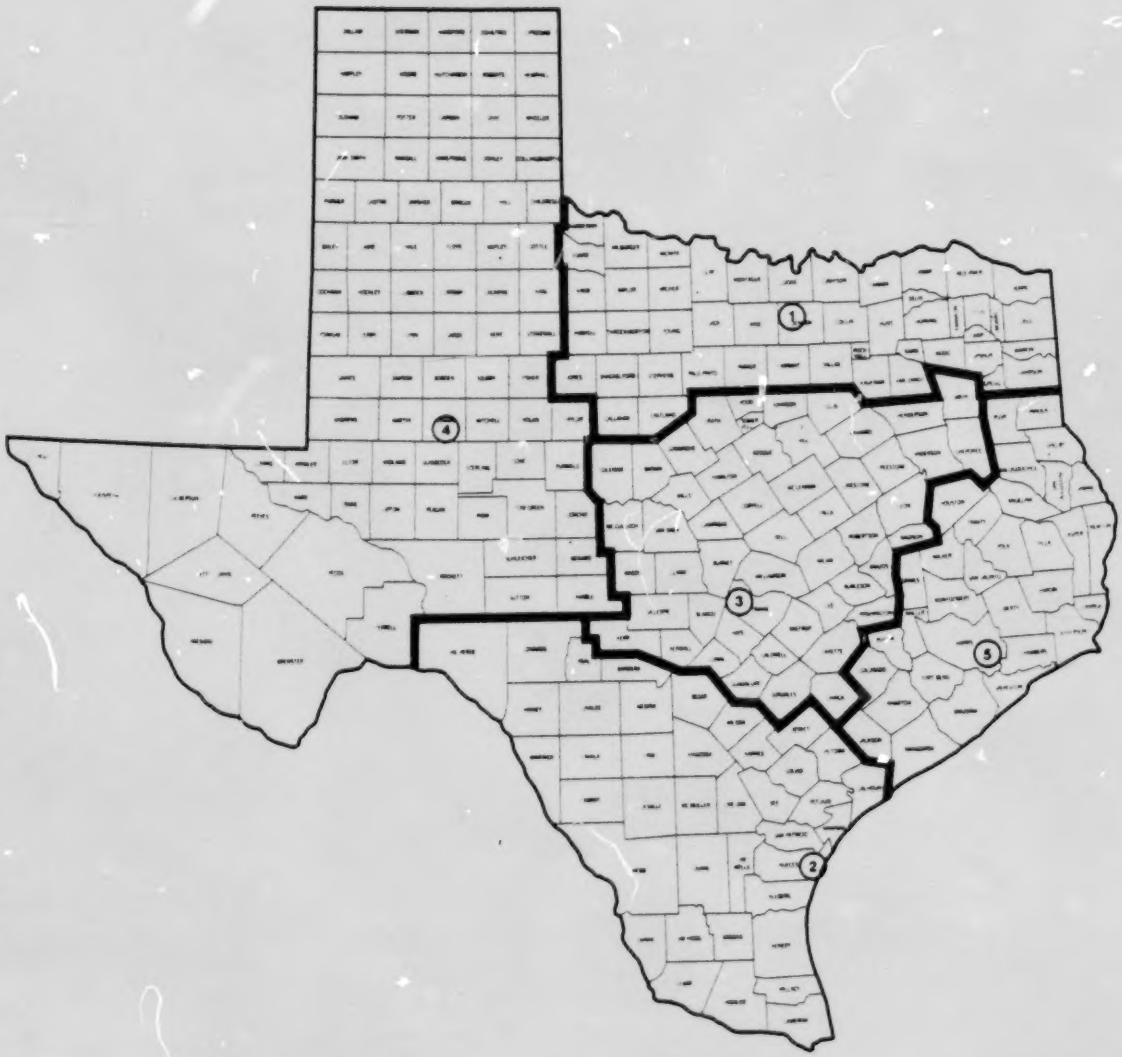
*Note that some Consultants may serve areas in which they are not officed.

SOURCE: Texas Education Agency, Austin, Texas, June 1981.

FIGURE 19

TEXAS EDUCATION AGENCY

Vocational Office Education Consultants' Service Areas



SOURCE: Texas Education Agency, Austin, Texas, June 1981.

TEXAS EDUCATION AGENCY

Offices of Vocational Office Education Area Consultants

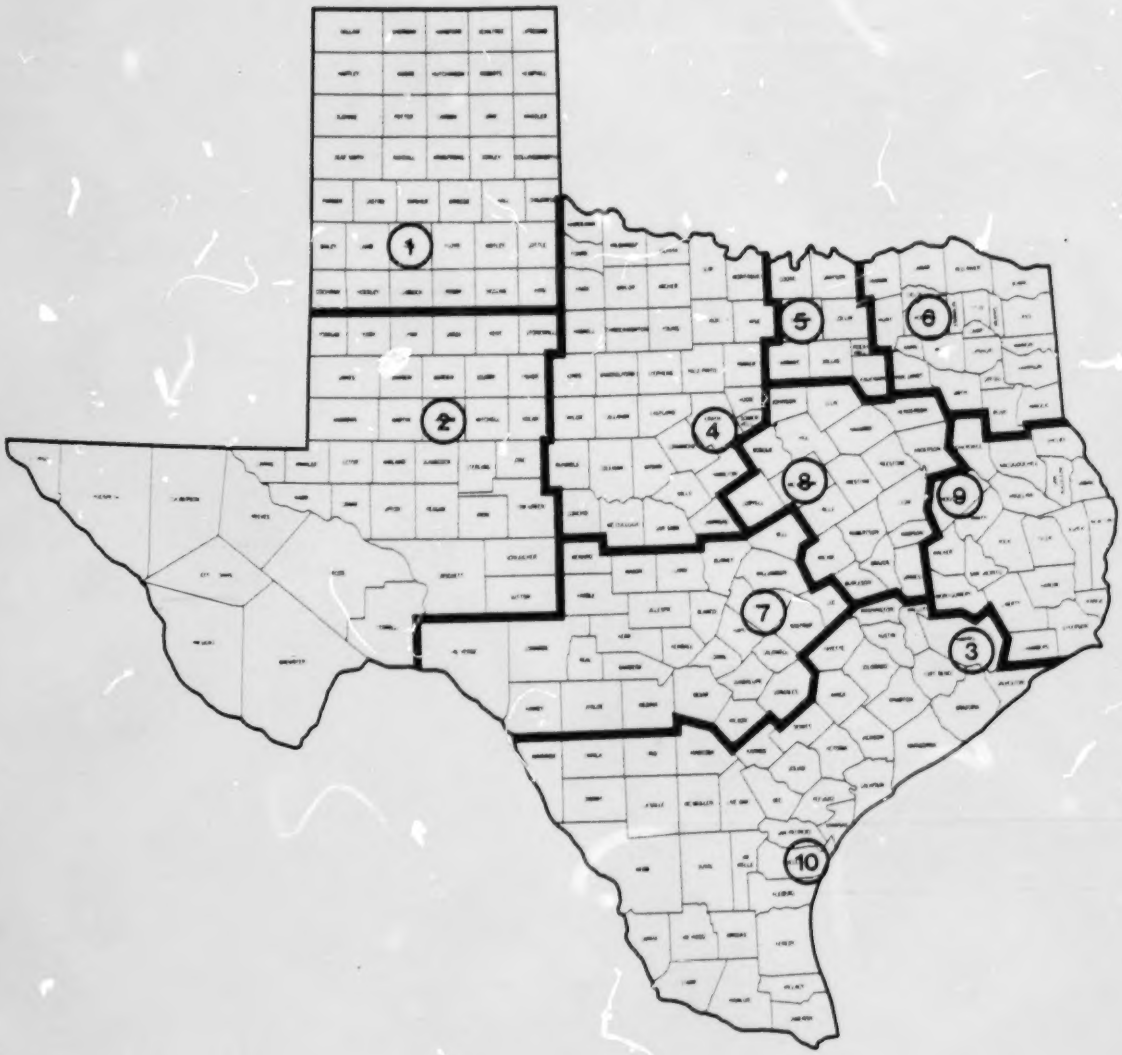
1. Denton
2. Corpus Christi
3. Austin
4. Big Spring
5. Houston

SOURCE: Texas Education Agency, Austin, Texas, June 1981.

FIGURE 20

TEXAS EDUCATION AGENCY

Homemaking Education Consultants' Service Areas



SOURCE: Texas Education Agency, Austin, Texas, June 1981.

TEXAS EDUCATION AGENCY
Offices of Homemaking Education Consultants

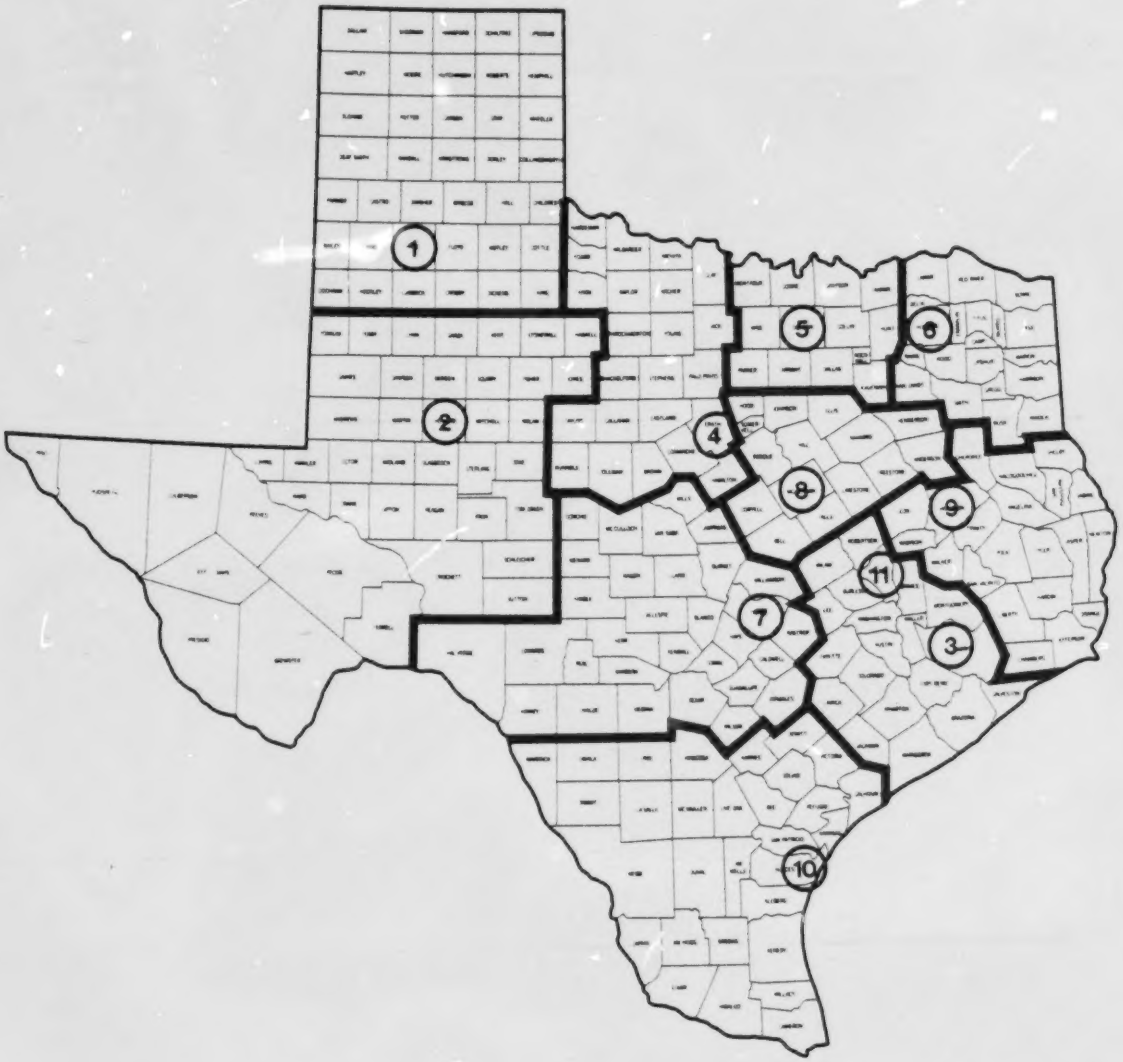
1. Plainview
2. Big Spring
3. Houston
4. Stephenville
5. Denton
6. Sulphur Springs
7. Austin
8. Waco
9. Crockett
10. Corpus Christi

SOURCE: Texas Education Agency, Austin, Texas, June 1981.

FIGURE 21

TEXAS EDUCATION AGENCY

Vocational Agricultural Education Supervisors' Service Areas



SOURCE: Texas Education Agency, Austin, Texas, June 1981.

TEXAS EDUCATION AGENCY

Offices of Vocational Agricultural Education Supervisors

1. Plainview
2. Big Spring
3. Houston
4. Stephenville
5. Denton
6. Sulphur Springs
7. Austin
8. Waco
9. Crockett
10. Corpus Christi
11. (State Office) College Station

SOURCE: Texas Education Agency, Austin, Texas, June 1981.

These areas are used by TEA personnel to engage in planning educational activities. These areas are depicted on maps on the following pages, and the cities in which these program offices are located are also included.

The linkages created by individuals using these areas can best be summarized by stating that linkages between occupational education in local school districts and TEA is provided by area consultants who are housed in an occupational area office located in the area to which they are assigned. The consultants serve as a liaison between the program directors to whom they are assigned and the local education agencies. Area consultants provide information and technical assistance in such areas as interpretation and implementation of policies and regulations, curriculum development, youth organizations, and other program activities.

The Regional Education Service Centers provide another linkage between the local school districts and TEA. The Centers receive support from both state and local funds and comprise a network created to assist TEA administrators in disseminating information, conducting staff-development workshops, and providing technical assistance at the local level.

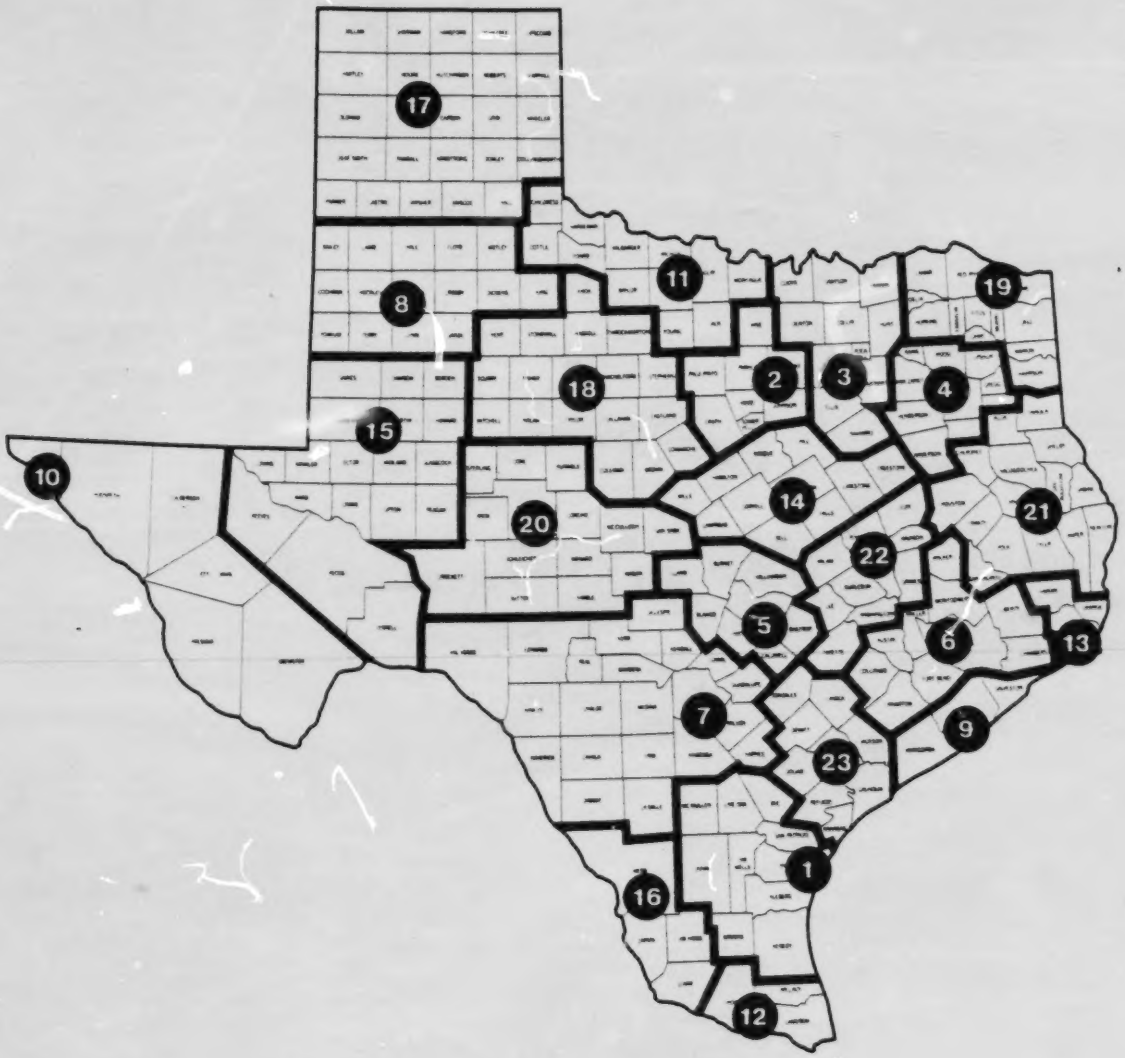
It should be noted that the counties assigned to consultants and the counties assigned to the Regional Education Service Centers are not congruent.

• TEXAS STATE COMMISSION FOR THE BLIND (SCB)

Through its division of Vocational Rehabilitation Field Services, the Commission administers a statewide network of rehabilitation services designed to meet the specialized needs of severely visually disabled persons, with the goal of enabling them to gain the skills necessary for suitable employment. SCB's Career Development Unit create new areas of

FIGURE 22

Texas State Commission for the Blind Service Areas



SOURCE: Texas State Commission for the Blind, Austin, Texas, June 1981.

Texas State Commission for the Blind Field Offices

1. Corpus Christi
2. Fort Worth
3. Dallas
4. Tyler
5. Austin
6. Houston
7. San Antonio
8. Lubbock
9. Galveston
10. El Paso
11. Wichita Falls
12. Harlingen
13. Beaumont
14. Waco
15. Odessa
16. Laredo
17. Amarillo
18. Abilene
19. Texarkana
20. San Angelo
21. Lufkin
22. Bryan
23. Victoria

SOURCE: Texas State Commission for the Blind, Austin, Texas, June 1981.

employment for the blind in the competitive job market by exploring previously utilized areas of employment, selling management on the capabilities of blind workers, analyzing specialized training for clients to work in such areas, developing and identifying appropriate training resources, and relaying this information to other SCB staff. The SCB's Business Enterprise Program provides assistance to blind individuals who operate small businesses. Qualified blind adults are trained and certified as vending stand managers and are placed in established businesses under SCB jurisdiction.

Also, SCB operates a vocational rehabilitation services program which provides services to adult visually handicapped persons who have potential for gaining and/or retaining employment. These services, which are rendered free of charge, include: evaluation of rehabilitation potential; counseling and guidance; physical and mental restoration; vocational and other training (including books, tools, and other training material); transportation; services to family members; occupational licenses, tools, equipment, initial stock and supplies; and reader services, rehabilitation teaching services, and orientation and mobility services for the blind.

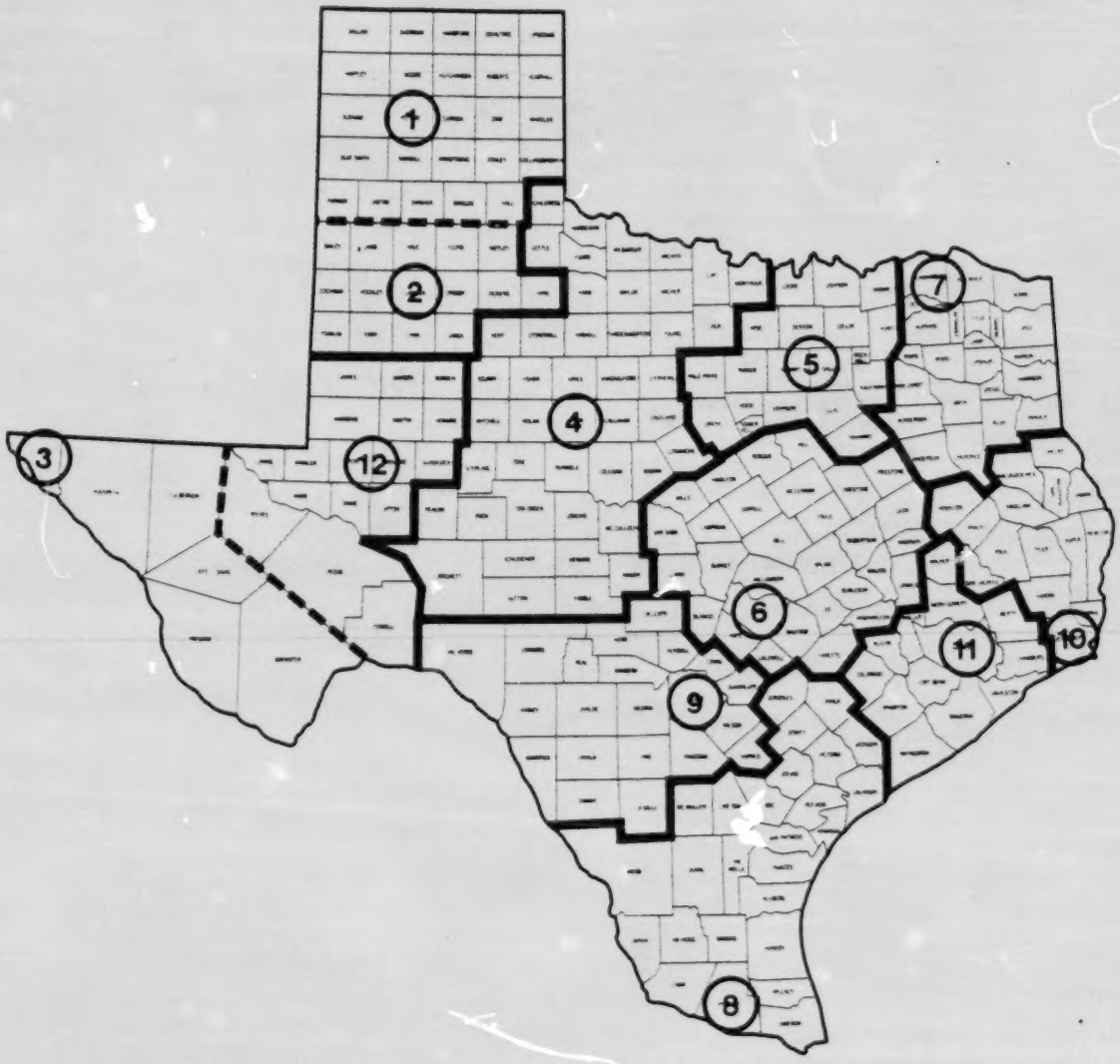
The SCB administers its programs in 23 services areas, which are depicted on a map on the following page. Also included is a list of the cities in which SCB Field Offices are located.

• TEXAS DEPARTMENT OF HUMAN RESOURCES

As previously noted, the Texas Department of Human Resources (TDHR) and the Texas Employment Commission jointly operate the WIN program.

FIGURE 23

Texas Department of Human Resources Service Areas



SOURCE: Texas Department of Human Resources, Austin, Texas, June 1981.

Regional Offices of the Texas Department of Human Resources

1. Amarillo
2. Lubbock*
3. El Paso*
4. Abilene
5. Arlington
6. Austin
7. Paris
8. Edinburg
9. San Antonio
10. Beaumont
11. Houston
12. Midland

*Denotes actual headquarters office of split region.

SOURCE: Texas Department of Human Resources, Austin, Texas, June 1981.

There are 12 services areas used by TDHR personnel in administering programs. These areas, and the cities in which their Regional Offices are located, are shown on the following pages.

The purpose of the TDHR is to develop and administer programs designed to assist persons handicapped by inadequate economic resources, unable to cope with social problems, or unable to afford necessary medical services.

• TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION (TDMHMR)

The purpose of the TDMHMR is to provide for, develop, improve, and coordinate the delivery of mental health and mental retardation services to the people of Texas. It also includes encouraging local agencies and private organizations to assume responsibility for the effective administration of mental health and mental retardation services through the following: promotion of mental health; prevention of mental impairments; intervention for early diagnosis and treatment; restoration of the mentally impaired; and administration for effective management.

The desired goal of these efforts is that all mentally impaired persons be afforded the opportunity to develop their mental capacities to the fullest extent practicable; to become healthy, contributing, self-sufficient members of society; and be plagued to the least extent possible by emotional and mental distress and impairment.

The TDMHMR offers all services concerned with research, prevention, and detection of mental retardation and all services related to the education, training, habilitation, care, treatment, and supervision of state schools and outreach programs, a statewide genetics screening and counseling programs in Denton, the development disabilities program, and the Leander Rehabilitation Facility (theraputic recreation programs).

Each state school for the mentally retarded operates a special independent school district.

It should be noted that TDMHMR ovvers a full range of services to meet the needs of a diverse clientele of all age ranges, levels of competency, and dependency. These include: academic training; job placement services; personal and social adjustment training; pre-academic training; pre-vocational training; self-help skill training; vocational training; work activity training; work adjustment training; and physical therapy. Other transitional services, evaluation and assessment services, treatment servic , care services, referral services, and transportation services are also availeole.

State schools, state hospitals, state school outreach programs, human development centers, and community MHMR centers seek to help their clientele become more self-reliant economically and psychologically. Vocational programming to help their clients obtain vocational skills and employment is one of the services provided towards the goal of enabling mentally disabled persons to lead useful and productive lives. The four basic types of vocational programs offered through TDMHMR facilities are: preworkshop or prevocational training; work activity centers; sheltered workshops; and client worker programs.

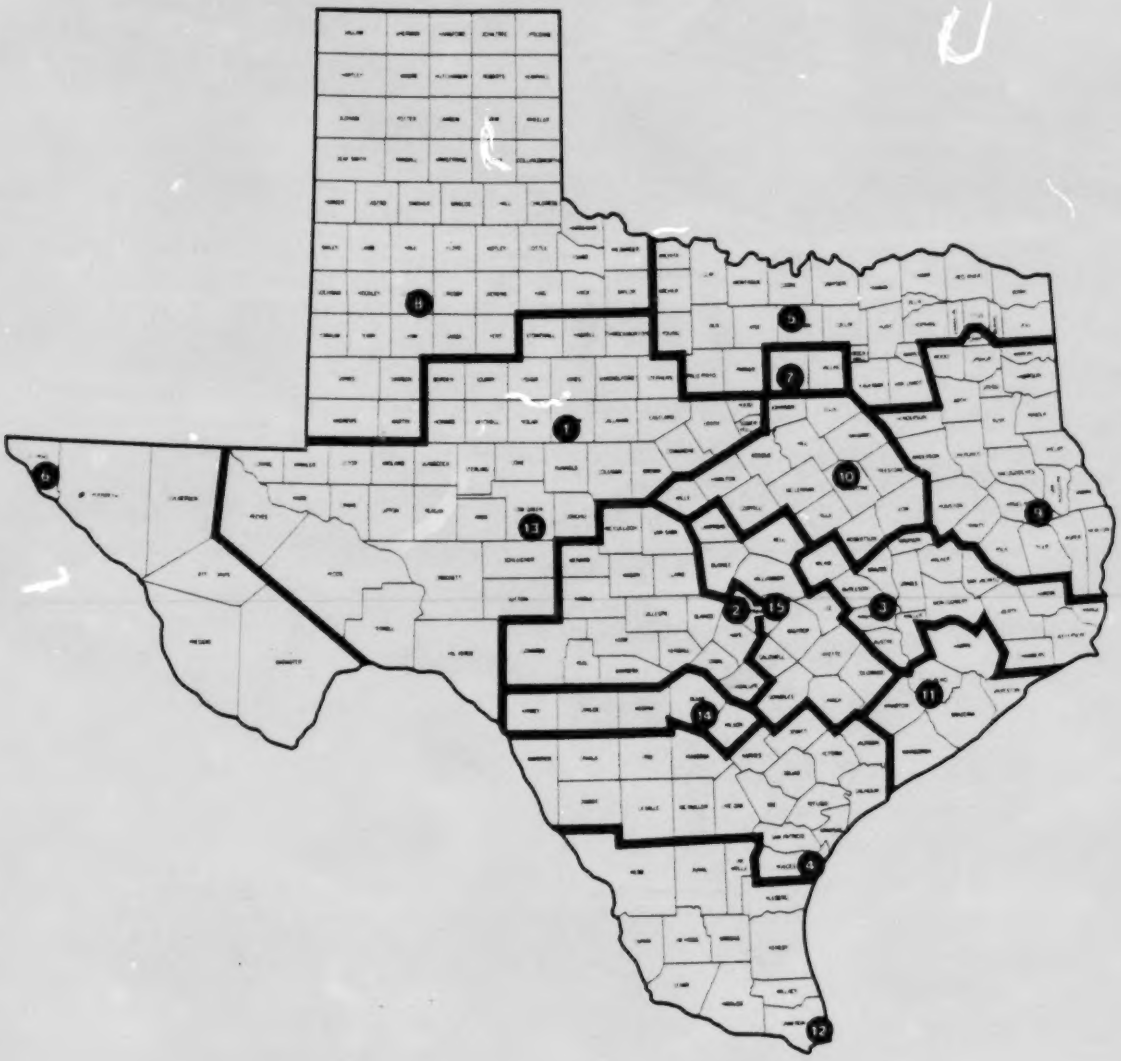
The TDMHMR uses service areas for the following activities:

- Residential Mental Health Retardation Facilities
- Residential Mental Health Facilities
- Community MHMR Centers
- State Centers and Research Institute

These service areas, as well as the city in which each facility is located, are shown on the following pages.

FIGURE 24

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION
Residential Mental Retardation Facilities Service Areas



SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981.

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION

Location of Residential Mental Retardation Facilities

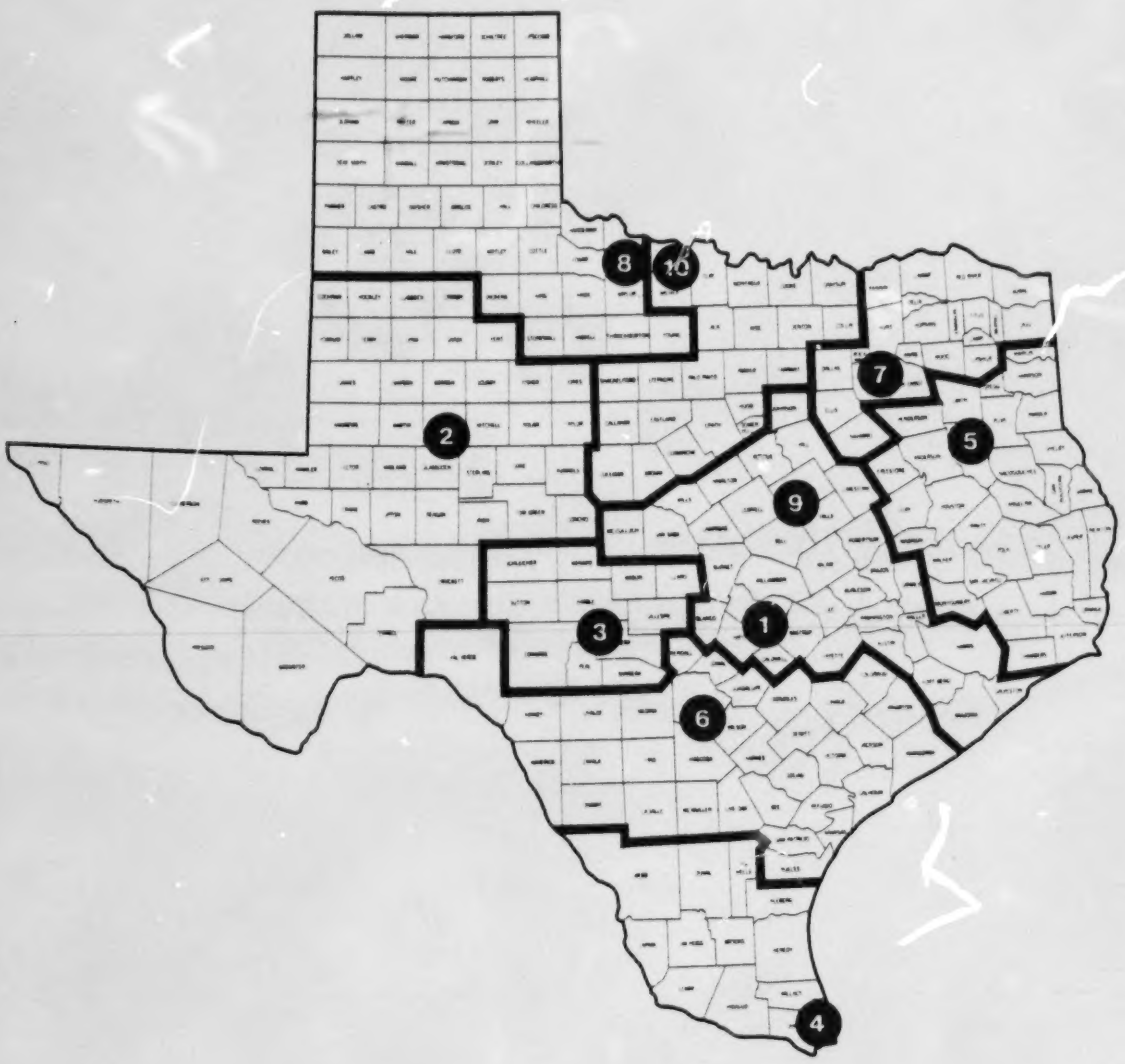
1. Abilene
2. Austin
3. Brenham
4. Corpus Christi
5. Denton
6. El Paso
7. Fort Worth
8. Lubbock
9. Lufkin
10. Mexia
11. Richmond
12. Rio Grande City
13. Carlsbad
14. San Antonio
15. Austin

SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981.

FIGURE 25

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION

Service Areas of Residential Mental Health Facilities



SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981.

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION
Location of Residential Mental Health Facilities

1. Austin
2. Big Spring
3. Kerrville
4. Rio Grande City
5. Rusk
6. San Antonio
7. Terrell
8. Vernon
9. Waco
10. Wichita Falls

SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981.

FIGURE 26

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION

Service Areas of Community MHMR Centers

SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION

Location of Community MHMR Centers

1. Abilene
2. Amarillo
3. Austin
4. San Antonio
5. College Station
6. Temple
7. Plainview
8. Brownwood
9. San Angelo
10. Dallas
11. Lufkin
12. Tyler
13. El Paso
14. Victoria
15. Galveston
16. Houston
17. Waco
18. Lubbock
19. Corsicana
20. McKinney
21. Texarkana
22. Corpus Christi
23. Stephenville
24. Midland
25. Longview
26. Beaumont
27. Fort Worth
28. Denison
29. Edinburg
30. Wichita Falls

SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981.

FIGURE 27

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION

Service Areas of State Centers and Research Institute

SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981.

TEXAS DEPARTMENT OF MENTAL HEALTH AND MENTAL RETARDATION
Location of State Centers and Research Institute

1. Amarillo
2. Beaumont
3. El Paso
4. Laredo
5. Rio Grande City
6. Houston*

*Research Institute

SOURCE: Texas Department of Mental Health and Mental Retardation, Austin, Texas, June 1981.

As these brief program descriptions, and service area maps have demonstrated, the responsibility for job training in Texas is shared among a diverse group of program deliverers. Each agency involved in providing employment and training and related support services has a specific clientele -- many with multiple needs -- and each agency has developed its own method of delivering these services to Texas citizens.

The use of different service areas for planning and delivery of employment and training and related support services points out the need for the use of common areas for planning and delivering these services. The potentials for coordinating these services is discussed in the next section of this report.

PART V: POTENTIALS FOR COORDINATION

A recognized need for better management of a growing state government in Texas, and for better coordination at the state and local level of an increasing number of federal programs during the 1960s led, as has been demonstrated, to specific legislation at the federal and state levels designed to bring order out of increasing chaotic program administration.

As noted in Part III of this document, planning is a governmental purpose and function of the state. The Texas Legislature in 1967 passed legislation creating a Division of Planning Coordination in the Governor's Office, and named the Governor the "Chief Planning Officer" of Texas.[1] The Division was to

> . . . serve as the State Clearinghouse on all state agency applications for federal grant or loan assistance, and . . . be notified of all applications for federal grant or loan assistance prior to actual submission of such applications.[2]

Circular No. A-95, issued July 24, 1969, by the President's Office of Management and Budget, represented a federal effort to improve the coordination of federal, state, and local programs. Based upon the Intergovernmental Cooperation Act of 1968 (PL 90-577), the A-95 review process was formulated by the Executive Office of the President to carry out Title IV of the Act. This Title requires

> . . . that all viewpoints and objectives -- national, regional, State and local -- to the extent possible, be considered when Federal development projects are being planned. Federal aid, to the maximum extent possible, shall be consistent with the objectives of State, regional, and local comprehensive planning. Each Federal department and agency administering a development assistance program must consult with and seek advice from other singificantly affected Federal agencies in an effort to assure fully coordinated programs. Insofar as possible, Federal planning shall be coordinated with and made a part of local and areawide development planning. Furthermore, to strengthen local government, Federal agencies in making loans or grants should give preference to units of general local government over special-purpose units.[3]

The laws and initiatives that are directed at efforts to better plan and coordinate federal and state programs are of a general nature. In order to visualize how manpower training programs and related support services can be better coordinated and planned, these programs must be seen from the perspective of a larger viewpoint than merely these programs themselves. The reason for this is that any attempt to coordinate these programs must be done within the context of existing laws, and that the framework for many of these laws is general. To be sure, there are specific mandates for CETA and other programs to coordinate with other agencies, but much of this coordination has yet to come to fruition. This section of this report is devoted to examining what can be done to provide leadership and direction for these efforts.

Most of the people receiving the services of manpower training programs and related support services have multiple needs. That is, no one program can provide all of the resources to meet client needs. Individual programs, then, generally do not have the resources to deal with the broad causes of problems. As a result of their independent nature, programs continue to deal with symptoms; and as long as the underlying causes of problems are ignored, it is likely that the need for numerous programs will continue.

Federal categorical programs are of an independent nature; and each program competes with others for the same available funds, particularly at the federal level. The ripple effect is transmitted through to state and local levels; and each program builds its own constituency which demands its continuation or enhancement -- possibly at the expense of other programs. These factors, coupled with the concern expressed regarding the existing system of human service programs and the constant review of these programs, tend to make state angencies implementing these programs highly sensitive to criticism.[4]

There are 18 primary state level agencies in Texas dealing with human services programs; collectively, they implement approximately 100 federal programs. This is done "through 249 state programs that translate into over 1600 individual unique services at service delivery level."[5]

In a very perceptive analysis of the problems connected with efforts to coordinate human services programs generally, E. Generes Dufours notes:

> Texas state agencies exist by authority of and respond directly to the Texas Legislature for implementation of programs matters. One of the possible reasons for the lack of state agency results in the field of coordination is that no requirements for coordinating programs or efforts have been placed upon state agencies as a condition of funding either by the Congress or the Texas Legislature. Also, at the state level, no responsible executive authority has mandated coordination in the delivery of human services.[6]
>
> The Legislature has not required agencies to be comprehensive in their approach to service delivery. Neither has the Legislature required a broad plan for Texas that the biennial budget could be developed to support. The state budget, like the federal budget, is an expenditure authorization for independent program expenditures. There is no comprehensive movement of these funds toward common objectives to reduce problems.[7]

The Regional Planning Act of 1965, and Article 4413(32a), passed in 1967 by the Texas Legislature, form the basis for comprehensive state planning in Texas. The Governor, as "Chief Planning Officer," is authorized to create interagency planning councils, while the regional planning commissions (or Councils of Government -- COGs), were created to provide a mechanism to coordinate state and federal programs throughout Texas. The Intergovernmental Cooperation Act of 1968 (PL 90-577) was a federal effort to suggest the use of state, substate, regional and local government objectives to coordinate programs.

The Texas statutes, Article 4413(32a), the Regional Planning Act of 1965, and the Intergovernmental Cooperation Act of 1968, are "complementary approaches to management in government."[8] A Division of Planning Coordination (DPC) was created by Governor John Connally, and was expanded by Governor Preston Smith. In February 1976, however,

> . . . the executive emphasis shifted abruptly away from planning and coordination toward the Governor's budget preparation. This occurred trhough a merging of the Governor's Division of Planning Coordination (DPC) and the Governor's budget office. A major reduction in the number of employees occurred simultaneously. A Budget and Planning Office (BPO) was created as a result of the merger. The smaller BPO focused primarily on the budget. As a result, many of the planning and coordinating activities of the early 1970s were no longer carried out by the smaller staff. Communication among the state level agencies, the office of the governor, and the planning regions in Texas diminished under this new arrangement.[9]

The goal of the various pieces of legislation enacted by state and federal officials addresses several issues: 1) centralized planning; 2) efficient allocation and use of resources; and 3) coordination of programs. Centralized planning and resource allocation should occur at the local level, and it should be based on service delivery level needs developed in perspective of all of the problems facing each community. While developing broad goals and specific broad objectives would appear to be an appropriate state level mission, implementing or operating programs can best be conducted where the problems exist -- at the local level.

While state and federal programs are delivered at the local level of governments in cities and counties, they are formulated and planned at the state and federal levels. Dufours charges that

> Neither of these federal or state processes involved persons responsible for things at the local level. Responsible persons at local levels include not only elected officials, but also local level staff planners and program implementers. These local level persons do not work with state and federal implementors, although they deal with similar problems. Therefore, at any given level in the city and the county there are several independent systems in operation simultaneously, providing similar services. In some cases they serve the same people. Neither of these systems has enough funding to do all that is needed for the people they are trying to serve.[10]

Noting that state agency officials at the local level "tend to be unsure of their capacity to coordinate," Dufours suggests that "close responsive association with local, general-purpose governments can not only support agency local offices, but elected officials can also help them do a better job." State agencies, he says, "generally do not plan, budget, and carry

out their legislated responsibilities in close association with each other." Local elected officials can, he notes, "help communicate local needs to higher level regional and state staffs."[11] He contends that

> The elected officials at local levels who, for the most part, have been left out of the federal and state decision making process, are an unused resource. Their great value is that they are close to the people who support all the federal and state programs.[12]

At the same time, problems at the local level abound. Small cities do not get much revenue sharing funding, do not have extensive or sophisticated planning capabilities, and are not CETA prime sponsors. This is one reason that "many cities have turned to Councils of Government to assist them with their problems."[13] The COGs, through fewer changes in membership with every election, are more stable than cities and counties. By bringing together city elected officials and county elected officials, common interests reflecting more than a city or county interest can be generated and formalized. Because COG positions are relatively stable, they represent one viable mechanism through which to coordinate human service programs.

Dufour charges that

> Many state agencies have shown a reluctance to define the authority and responsibilities of their regional and local offices. In a state the size of Texas, local offices carry on a de facto decentralized process. An Austin office which feels that it is controlling operations in Houston, Texarkana, or Amarillo may be overlooking reality. The federal government has shown clearly that publishing regulations down to the minute detail does not control the system. Rather, it sets up an uncontrolled system. This process focuses upon detailed processes rather than objectives or results. Surely the federal system has long been out of control. The state level as a management level can establish broad goals and specific objectives for its subordinate elements to achieve.[14]

"The state," Dufour continues, "is the action partner in many federal programs," implementing these programs on behalf of the government, and with federal funding support. By creating and passing the state budget, the Texas Legislature sets the tone for the functioning processes of the state. It also establishes the rules under which local communities and state agencies function. By virtue

of this power, it "thereby exercises an element of control over the service delivery level." He concludes that "it is at this state level where the bringing together of the fragmented federal system must actually begin, if it is to be achieved within the state."[15]

How can this occur? One mechanism is through the interagency council system, which was authorized and initiated under Article 4413(32a). Designed to bring together state agencies into a planning group to address state issues, it is legislatively headed by the state's Chief Planning Officer, the Governor. It has been noted that

> If no comprehensive effort is made to focus the resources of the state of Texas on the priority needs of Texans, as seen from a comprehensive viewpoint, then there is little need to bring agencies together at the state level. When some $7 billion currently goes toward the broad area of human services annually, this magnitude of expenditure of public funds suggests something better than individualistic agency approaches. To maximize the prudent expenditures of public funds is called for in V.A.C.S. 4413(32a). To do this successfully will take lateral communication, an established common direction, and an exercise of leadership in the field of human services not yet present.

"To exist at substate regional and local levels," the researcher concludes, "lateral communication must be sanctioned and supported among the agencies at the state level."[16]

The most recent use of interagency planning councils has been in Governor William P. Clements, Jr.'s Texas State Government Effectiveness Program. Noting his authority "to appoint interagency planning councils to consider a common problem and undertake joint interagency activities," he established three councils "to contribute to and support improved state government management, including but not limited to the design and initiation of programs in the particular area of government from which they are named to reach . . . goals."[17]

Clements noted that

> It is intended that the creation of these councils will open lines of communication between these areas of government and the governor could identify other means of improvement and provide a closer working relationship than has existed in the past. The councils will provide recommendations to the governor regarding major problems and issues

in their respective areas of government.[18]

In creating this interagency planning council body, the opening sentence of Section 1 of Article 4413(32a) seems to coincide with Clements' strategy. This sentence states that

> The imperative need to maximize the prudent use of governmental revenues being self-evident, the Legislature recognizes that planning is a governmental purpose and function of the state and its political subdivisions.[19]

Functionally, Article 4413(32a) meets the need for an authority above that of each program or agency head, in the process of bringing together the different program elements in human service programs which can be successfully coordinated. In Texas this is not necessarily brought about constitutionally. While constitutionally, Texas is a comparatively weak governor state, it has produced some strong governors.[20] Since the Texas Legislature passed Article 4413(32a) in 1967, the Governor, through his role as Chief Planning Officer of Texas, accompanied by his ability to call agencies together to plan, can exercise the role of the higher authority -- and this, in turn, can overcome a weakness inherent in the independent agency concept. This arrangement has both strengths and weaknesses. Dufour says:

> The appointed, independent boards of state agencies in Texas can work against multiples of agencies coming together in a coordinative process. This can be overcome by developing a need which transcends the individual focus of the agency to better serve the needs of the people of the state.[21]

Set against this general context of coordinative laws, efforts and initiatives at both the federal and state levels, it is now possible to specify how these mechanisms can be used to develop a job training system policy for the state of Texas.

In terms of the Comprehensive Employment and Training Act (CETA) Amendments of 1978, state governors emerge in a role that is functionally incomplete. While there are definite attempts to place major collaborative, cooperative or "partnership" processes in the hands of the Governor, at the same time

the Governor is not a major "actor" in the disposition of federal CETA funds in the state. On one hand, the Governor is expected to be a functional leader of a statewide network of employment and training services, and on the other hand, those same federal funding sources offer only modest opportunities for influence.

To give the Governor's Office an added role in defining statewide employment and training objectives, one obvious strategy would be to form an interagency planning council. To do this would imply that statewide evaluative instruments for program effectiveness would have to be created. If this evaluation process did not have any noticeable effect on funding, attempts to implement it would probably meet with resistance.

There is, as has been reported in an earlier section of this report, a State Employment and Training Council (SETC), whose function is to evaluate CETA programs and report findings and recommendations for improvement to the Governor. While this council is a potentially valuable tool through which the Governor could exercise considerable influence, it is useful to review some of the Governor's other responsibilities under the CETA law of 1978. A brief review of the major assignments to the Governor's Office places the Governor's role in a larger perspective.

First, CETA's purpose is uncomplicated: targeted groups are to be moved to employment providing increased income and enhanced self-sufficiency, by coordinated, flexible, decentralized systems. Section 2, Title I, advocates the "maximum feasible coordination of plans, programs and activities . . . ." Linkages must be established with vocational rehabilitation, the employment service, local education agencies, public assistance, vocational education and community-based organizations (CBOs). The CBOs include United Way, Mainstream, SER—Jobs For Progress, the National Urban League, Opportunities Industrialization Centers, Community Action Agencies, and Community Development Organizations.

Prime sponsors are responsible for specifying the methods of institutional arrangements to involve CBOs, vocational education, and other delivery agents. Section 103(a)(7) requires "consideration of the effectiveness of existing services and facilities, to include the state employment service, state vocational education and vocational rehabilitation agencies, state public assistance agencies, area skill centers, local education agencies, postsecondary training and education institutions, community action agencies and other public and community-based agencies."[22] Under this same provision, Part (9) requires a description of arrangements ensuring participation of consultation of local education agencies, vocational education agencies, community-based organizations, federal and state agencies, organized labor, business and other institutions.

Title I, Section 105(a), with its many subsections, specifies activities for the Governor's coordination of these plans. But, even more crucial, it is participation of the Governor that is necessary for any CETA funds to be distributed in a state. Section 105(a) declares that

> Any State seeking financial assistance under this Act shall submit a Governor's coordination and special services plan to the Secretary (of Labor).

The Governor's Office is also involved with the following: 1) coordinating all employment and training, education and related services, provided the state by prime sponsors, by state education agencies and other appropriate institutions of vocational and higher education, state and local public assistance agencies. Section (2) required coordinating programs financed under the Wagner-Peyser Act to assist in negotiating partnership arrangements between prime sponsors and state employment security agencies. Section (4) requires assurances that prime sponsor planning will take account of the community development, economic development, vocational education, vocational rehabilitation and social services. Section (5) mandates the exchange of

information between states and prime sponsors with reference planning of human resource development, including the use of educational facilities. Section (6) specifies developing and providing of information on state and local labor market conditions to prime sponsors. Section (7) requires that technical assistance be made available by the Governor's Office (with or without reimbursement) to prime sponsors. Section (8) sanctions "special model training and employment programs for the state. Section (10) mandates that the Governor's Office is to provide labor market and occupational information to prime sponsors and appropriate educational agencies and instutions without reimbursement. And Section (11) requires the Governor's Office to facilitate activities of the State Occupational Information Coordinating Committee (SOICC), to encourage the systematic use of occupational information for prime sponsors. The statute gives overwhelming attention to the linkage issue and puts the Governor -- even as a supporting actor -- in a highly visible role.

Another responsibility of the Governor is serving those CETA-eligible clients in the Balance of State (BOS) area not covered by prime sponsors. In Texas, this responsibility has been delegated to the Texas Department of Community Affairs (TDCA).

During the 1980 fiscal year, CETA provided $10.3 million to the Texas Governor for statewide programs. These programs were also administered by TDCA.

The Governor's influence over how CETA programs can be administered in Texas is considerable. The BOS area currently covers a larger area in Texas than the area served by prime sponsors; with responsibility for administering CETA

programs in the BOS, the Governor is in a strong legal position to designate standards and methods of service delivery in the BOS. The BOS prime sponsor, technically the Governor, is in a position to view problems of program management in the BOS as a "model" for the rest of the state. Contingent upon the use of any BOS program delivery system -- particularly in coordination and planning -- is the success of the BOS prime sponsor in handling the scattered domain of programs in population-thin areas. Thus, the high visibility of the BOS prime sponsor program operations can be a two-edged sword.[23]

The Governor's Office, then, has a unique role in achieving an effective collaboration between CETA prime sponsors and other state agencies, particularly those supplying support services. One incongruity is the requirement that CETA prime sponsors transmit their employment and training plans to the Governor for review and comment prior to submission to the Secretary of Labor; the "review and comment" doesn't go far enough. On one hand, the Governor is obligated to prepare a "coordination and special services plan"; and on the other, the Governor is not provided the authority and resources necessary to assure that this plan can be implemented. One way to pool the authority and resources necessary is for the Governor to obtain more power, particularly in allocating CETA funding to prime sponsors in the state.

As long as CETA prime sponsor funding comes almost directly from Washington, and state agency funding comes from state and local levels, there is a lack of symmetry on the "need" for collaborative efforts to coordinate programs. The federal government, through legislation, has <u>mandated</u> coordination at the state level; however, with existing budgetary arrangements it is the federal government (and <u>not</u> the state office) that dictates prime sponsor response to mandates for coordination. "If the Governor's Office has no formal influence on prime sponsor activities other than 'comments,'" notes economist Paul Sultan, "how can the office be held accountable for the program?"[24]

One response to Sultan's observation was provided in Congress, during the 1978 House Subcommittee Hearings on CETA:

> If the Governor is not required to approve such plans, he should be provided with some stronger means of meeting his responsibilities with regard to coordinating all job assistance activities in the state . . . . When prime sponsors, local agencies, and organizations are unable to develop an integrated delivery system, then state level guidance, encouragement, persuasion, incentives, directives, or whatever is needed, should be provided by the Governor to ensure that planning is accomplished.[25]

Coupled with the lack of power that the Governor has in influencing prime sponsors in program delivery is the reality that the Department of Labor (DOL) exercises the real control through allocating funds. Sultan notes that

> As a practical matter, one is not free to devise innovative programs to serve local definitions of need if the DOL is to define program targets, regulate the performance in achieving targets, and maintain the right to withhold funds if federal expectations are not realized. It turned out, after all, that while prime sponsors had some discretion in the assignment of delivery agents, that choice was dominated by the reality that the prime sponsors themselves were the delivery agents -- the vehicles if you will -- serving the increasingly explicit expectations of DOL's Regional Administrators. While those in the upper levels of the administrative hierarchy continue to pay lip service to the rich opportunities for innovation in local program planning, some prime sponsors attest these efforts as seldom funded and are viewed as exercises in futility.[26]

Summing up the Governor's structural place in the CETA system, Sultan declares:

> The Governor's Office was in a position to rationalize the use of resources within the state, while maintaining the diversity of pattern of services from state. We could have the best of both worlds -- some measure of uniformity of performance standards as well as regional autonomy. Secondly, the Governor's Office was a locus for admininstrative control for several state agencies, important to collaborative agreements that prime sponsors were encouraged to cultivate. The Governor's influence could be put to good use to cement such cooperative agreements, especially if the flow of federal funds were matched, in part, with the resource use for the support of state educational programs emanating from the state treasury. And thirdly, there is an obvious incongruity that the state office should serve as at least a titular head of the state's manpower programs, but be denied the authority to influence, in any predetermined fashion, the deployment of resources within the state. Under 1978 Amendments, the Governor's Office was given authority to review and comment on prime sponsor plans. But

> this was not equivalent to any veto influence. And while funds have been assigned to the Governor's Office for a variety of purposes, for the most part these are of a supportive nature. While the Governor's Office might set up an information base to serve both schools and CETA on manpower needs and the rest, these ancillary services tended did not give a featured role to the Governor. In brief, he is not a major 'actor' in the disposition of federal CETA funds within the state. There is an obvious incongruity of being a capstone leader of a statewide network with only modest opportunities for influence from federal funding sources.[27]

Despite these obvious restrictions on the powers accorded to the Governor's Office, it is possible to influence CETA prime sponsors' methods of service delivery, and goals in serving targeted client groups, by adopting a comprehensive approach to job training and related support services in Texas.

As has been demonstrated, the Governor, through his role as Chief Planning Officer of Texas, coupled with his ability to call agencies together to plan can take the lead in defining the state's role in the delivery of job training and related support services. The broad range of job training and related support services that are offered in Texas makes this task a necessity, especially in times when states are faced with having to provide more services for less money; or, even provide the same level of services for less money.

In order for the Governor to successfully address the problem of defining the state's role in the delivery of job training and related support services, two broad areas must be studied: 1) establishing priorities in these areas related to the needs of Texas' communities and citizens, and developing statements of Texas' goals and objectives to meet those needs; and 2) establishing a common delivery framework for use by CETA prime sponsors, state agencies and other service deliverers, particularly by using common areas such as the Council of Government (COG) unit upon which to base comprehensive planning efforts.

It should be noted that definitional problems are particularly acute is such an undertaking. Presently, there is no common terminology that is used in referring to components of the many job training and related support

service systems in Texas.

In considering the problem of delivering human services in Texas, the Texas Legislature created a committee to study and report recommendations for improving the system. A report by this group, the Senate Special Committee of the Delivery of Human Services in Texas, recommended that the Texas Legislature enact legislation "to require the creation of common terms and definitions for services and recipient groups, and common forms for client intake and statistical reporting."[28] The Committee also noted that

> When services and recipient groups are not called by the same names by different agencies, it is not only difficult to determine what services are actually provided, but also to compare the cost of the same service provided by different agencies. The inability to make these comparisons precludes identification of duplication or overlap in service provision.[29]

Speaking to the area of functional duplication of efforts, the Committee pointed out:

> There are over 200 information and referral services operating in Texas now, and at least five of them are run by state agencies. None of them has information on all state supported services . . .[30]

To help correct this problem, the Committee recomended that in addition to creating common terminology for human services systems, that the Texas Legislature phase in

> . . . a central information and referral system to provide the public, via toll free telephones, basic identification of appropriate services, eligibility criteria, and the location of nearest service delivery point.[31]

The Governor, through his ability to call agencies together to plan, is in a position to provide the leadership to bring order into what is now a highly fragmented system of delivering job training and related support services.

Perhaps the most crucial task is defining the various human services delivered by the various program operators in Texas that are to comprise the "job training and related support services" aspect of a state policy

addressing these concerns.

In Texas, the problem of coordinating job training and related support services to best meet the needs of citizens can be summarized as follows:[32]

1. There is no state policy for the overall direction of the numerous job training systems and related support services in meeting the needs of citizens of Texas.

2. There is no established consensus of priorities for job training in Texas, and no process for determining these priorities.

3. There are currently 249 state level human service programs in Texas operated independently under agency control, and these are focused upon narrowly defined perspectives.

4. The various state agencies involved in delivering job training programs and related support services all use different service areas, and do not operate from a common base of information. Using the COG regions as service areas has been a goal pursued by every Governor since John Connally; however, the use of common areas to deliver services in Texas has not yet been achieved.

In simple terms, the solution to these problems are:

1. Establish state priorities in job training and related support services that are directed toward reducing the causes of problems.

2. Establish a process by which Governors can be assisted in defining and articulating job training policy goals. A mechanism is needed for the coordination of the plans, policies, and programs that proliferate within their governments in addition to those imposed by the federal establishment.

3. Set direction for a state policy toward job training and related support services through state-level, jointly developed and coordinated, goals and objectives. Also, bring together agencies and programs at all levels of government in Texas to meet these goals and objectives.

4. Develop the regional dimension of job training and related support service activities by using Council of Government (COG) regions as common geographical regions for the delivery of services and the formulating of plans. In particular, utilize the provisions of the Intergovernmental Cooperation Act of 1968, the Regional Planning Act of 1965, and Article 4413(32a) as the basis for an integrated management system for the planning and delivery of federal and state programs of job training and related support services.

While it has been suggested that

> Producing the truly comprehensive state plan -- a plan that embraces all the concerns and dimensions of state government -- has proved an impractical objective for most States[33]

at the same time, there is nothing to suggest that "the production of a stripped-down version of the comprehensive plan that is selective in the issues it deals with," is not a viable approach to forming state-level policy.[34]

The initiative to take this type of action is already present in Governor William Clements' newly created Texas State Government Effectiveness Plan. Clements said that he created this plan because

> I believe that there is no greater challenge to government right now than to respond to the more limited resources in general and to the growing demand from the public for more acceptable tax levels.
>
> We can meet this challenge by implementing effective management techniques that will result in the improved delivery of essential services while stemming the rapid growth in state government.[35]

In designing this plan, and creating an interagency coordinating council to consider alternative means to accomplish objectives, Clements noted that "increased board member effectiveness" and "implementation of management by objective" were two of the goals to be accomplished.[36] Finally, the Texas State Management Development Center, organized in October 1980 by the State Agency Management Effectiveness Council, its purpose includes providing training programs for entry-level managers in all state agencies.[37] During a one-week residence program, participants learn to "understand the organization, objectives and strategies of Texas State Government."[38]

Because Governor Clements has emphasized excellence in management, with the long term goal of improving the administration of state government, it is not unreasonable to suggest that at some point important policy and program alternatives could not be incorporated into these efforts.

The case for strong gubernatorial leadership in the coordination of job training systems and related support services to meet state goals and policies has, as has been demonstrated, a sound basis in both state and federal laws calling for and/or encouraging coordination. In the employment and training field, particularly, a strong state comprehensive plan and policy could wield substantial influence over CETA prime sponsors who are, at this juncture, for the most part independent of gubernatorial influence.

By forming a comprehensive state policy for job training and related support services, in particular one which is tied to the budgetary processes at the Texas Legislature, the potential for achieving meaningful state economic planning becomes real.

Traditionally concentrated on industrial location and expansion, state economic planning is now becoming defined in terms of optimizing economic benefits, environmental quality, and resource conservation.[39] A state policy toward job training and related support services could well be the first step toward achieving a reduction in the cost of administering and providing social programs.

FOOTNOTES FOR PART V

[1]Article 4413(32a), V.A.C.S., Section 2 and 4(a).

[2]Ibid., Section 4(b)(2).

[3]"Legislative History of PL 90-577," United States Congressional Administrative News, 90th Congress, Washington, D.C., p. 4222.

[4]Dufour, Eugene Generes, Communication, Cooperation & Coordination: The Solution to the Welfare Dilemma, privately printed, Austin, Texas: E. Generes Dufour, 7508 Cross Draw Drive, Austin, Texas 78731, February 1981, p. 6.

[5]Ibid., p. 5 & 6.

[6]Ibid., p. 7.

[7]Ibid., p. 13.

[8]Ibid., p. 8.

[9]Ibid.

[10]Ibid., p. 44.

[11]Ibid., p. 16.

[12]Ibid., p. 12.

[13]Ibid., p. 15.

[14]Ibid., p. 54.

[15]Ibid., p. 69.

[16]Ibid., p. 47.

[17]"Establishing Management Effectiveness Councils for Higher Education, Medical Education, and State Agency," Document No. 802645, issued by William P. Clements, Jr., Governor's Office, Austin, Texas, April 4, 1980.

[18]Ibid.

[19]Article 4413(32a), V.A.C.S., Section 1.

[20]op. cit., Dufour, p. 73.

[21]Ibid.

[22]Sultan, Paul, Prospects for CETA Linkages: A Literature Review, Southern Illinois University, Edwardsville, Illinois, 1980, Part 2, p. 45.

[23]Ibid., p. 46-7.

[24]Ibid., p. 50.

[25]House Subcommittee Hearings on CETA - before the Subcommittee on Employment Opportunities of the Committee on Education and Labor, House of Representatives, 95th Congress, 2nd Session, H.R. 11086, Washington, D.C., February 22; March 1, 2, 8, 16; April 4, 6, and 18, 1978, p. 511.

[26]op. cit., Sultan, Part 2, p. 28.

[27]Ibid., Part 2, p. 42-3.

[28]Potential in the Patchwork, a report of the Senate Special Committee on the Delivery of Human Services in Texas, Austin, Texas: The Committee, November 1980, p. 83.

[29]Ibid.

[30]Ibid., p. 84.

[31]Ibid.

[32]op. cit., Dufour, p. 74; and State Planning: New Roles in Hard Times, A Summary for Governors, The Council of State Governments, Lexington, Kentucky: The Council, September 1976, p. 1-16. The problems and solutions identified in this section of the paper draw partially on information in these publications.

[33]op. cit., State Planning, p. 6.

[34]Ibid., p. 7.

[35]"An Overview of the Governor's Texas State Government Effectiveness Program," Governor's Office, Austin, Texas, 1980.

[36]op. cit., "Establishing Management Effectiveness . . . "

[37]"Texas State Management Development Center," brochure, Office of the Governor, Austin, Texas, 1980.

[38]Ibid.

[39]op. cit., State Planning, p. 7.

APPENDIX

APPENDIX I: REGIONAL COUNCILS IN TEXAS TODAY*

Regional councils in Texas are voluntary associations of local governments organized under state law to promote areawide planning and cooperation among local governments. They have various names, set in their charters, such as regional planning commissions, area councils, development councils, associations of governments, planning councils, and councils of government. Over 1,600 local governments participate in Texas' regional councils of government including counties, cities, school districts, and various special-purpose governments. Through regional councils these local governments work to improve the health, safety, and general welfare of their citizens; to plan for the future development of their area; and to make efficient and economical use of public funds.

Legal Authority

Regional councils are organized under a state law passed in 1965 (Article 1011m, V.A.C.S.). The provisions of this law authorize them to:

- conduct planning
- assist member governments in implementing plans
- contract with member governments to perform services
- review and comment on applications for federal and state grents-in-aid
- assist member governments in solving local governmental problems

Membership in regional councils is open to local governments including:

- counties
- cities
- school districts
- special districts

To assure accountability to the public, regional council governing boards must be composed of at least 66 and 2/3 percent elected local government officials.

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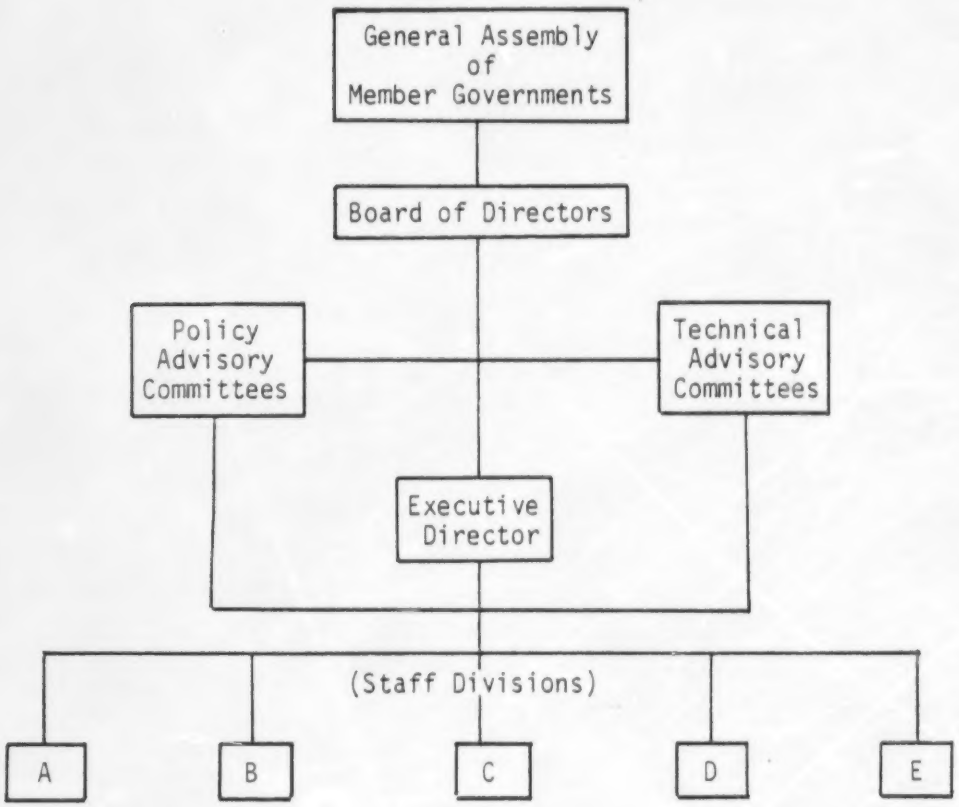
*Reprinted from "Regional Councils in Texas," by Rob Boyd, Texas Association of Regional Councils, Austin, Texas, circa 1980, by permission of James F. Ray, Executive Director, Texas Association of Regional Councils.

Organization and Staffing of Regional Councils

Texas regional councils organize their governing bodies to meet the unique needs of their area of the state. In most regional councils, a board of directors is the policymaking and policy approval authority. These governing bodies, largely composed of local government elected officials, may be augmented with general citizen representatives or representatives of minority groups. This organizational flexibility allows member governments to create the kind of board composition favored by their region.

The staff of each regional council, headed by an executive director, is responsible to the governing board. Widespread use is made of broad-based policy committees to assist the governing board in making decisions that affect the region. Staff work is often reviewed by policy committees and by technical committees made up of professional experts in the field of endeavor -- for example, transportation, water quality, criminal justice, or social services.

TYPICAL ORGANIZATION OF A REGIONAL COUNCIL



Regional Council Services

Texas regional councils provide services to their member governments and the public based upon decisions of their governing boards. While these service functions vary from council to council, common elements are:

- REGIONAL PLANNING to guide the development of the region and to promote economy and efficiency including comprehensive plans and plans for such specific activities as economic development, transportation, health services, housing development, law enforcement, manpower training, drug and alcohol abuse prevention, services for the aged, parks and recreation, and environmental protection.

- SERVICES TO MEMBER GOVERNMENTS to promote economy and efficiency in use of public monies through cooperative polic training, joint purchasing of equipment and supplies, shared computer services, and technical assistance to local governments in the areas of personnel management, financial management, grant administration, and economic development.

- SERVICES TO THE PUBLIC when a regional council is authorized by local governments and state or federal agencies to operate a program that can be more effectively administered at the regional level -- examples include nutrition services for the elderly, manpower training, emergency medical services, and alcohol and drug abuse prevention or treatment.

- COORDINATION OF GOVERNMENTAL PROGRAMS to assure that local officials have an active voice in coordinating use of tax dollars in their region. Regional councils are responsible under federal and state law for review and comment on applications for more than 250 state and federal grant-in-aid programs. Final decisions on funding these applications remain with the state or federal approving agency.

Openness and Public Accountability

Regional councils are political subdivisions of the state. This legal status subjects them to the requirements of state laws on open meetings, open records, and nepotism, as well as periodic financial audits. Designation as a political subdivision reinforces accountability to the public, to member governments, and to the state. Regional councils participating in various federal or state-administered contracts or grant-in-aid programs must also conform to individual funding agencies' requirements relating to citizen participation, public notice, and financial reporting and auditing. In addition, the Office of the Governor monitors the activities of regional councils by receiving and reviewing overall work plans and by reviewing regional councils' applications for federal funds. The Governor's Office also supervises the expenditure of general state financial assistance provided to regional councils.

Regional Council Funding

Regional councils rely upon the concept of "cooperative federalism" in which all units of government -- local, state, and federal -- share the fiscal responsibility for supporting programs that cross jurisdictional boundaries.

The composition of regional council financial support is as follows:

LOCAL FUNDS

- local government dues
- training memberships and tuitions
- contributions to special programs
- contracts for services with local goverments
- miscellaneous income from sale of publications and maps, etc.

STATE FUNDS

- general state financial assistance (based on population)
- state grant-in-aid programs for specific purposes
- contracts for services with state agencies

FEDERAL FUNDS

- direct grants from federal agencies
- state-administered federal funds
- contracts for services with federal agencies

APPENDIX II: SUMMARY OF OMB CIRCULAR NO. A-95 REVIEW ACTIVITIES IN TEXAS*

Office of Management and Budget Circular No. A-95 is a regulation designed to promote maximum coordination of federal and federally-assisted programs and projects with each other and with state, areawide, and local plans and programs. A-95 is often cited as based, in part, on the National Environmental Policy Act of 1969. It is not, its only relation to NEPA is that it serves as a means to secure state and local inputs to Environmental Impact Statements as required by law.

The philosophy behind A-95 is based on the view that: (1) At the federal level, there is a conglomeration of programs of assistance to state and local government that were developed piecemeal, are often duplicative and are sometimes even in conflict. (2) State and local governments are often hampered by constitutional, bureaucratic and jurisdictional constraints. Therefore, A-95 is an instrument for facilitating the needed coordination between the state and local governments and the federal programs.

The basic premise behind A-95 is that communication is fundamental to coordination. .Therefore, A-95 is designed to create a structured opportunity for intergovernmental communication on specific plans and projects.

However, recognizing the wide diversity among states, regions, and localities in the manner in which public business is conducted, A-95 puts few constraints on clearinghouses in regard to the review process - Clearinghouses are given limits on time for review and jurisdictions. In addition, efforts must be made to identify and allow to participate those agencies whose programs might be affected. However, A-95 does not prescribe

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*Reprinted from A Study of the Review and Comment Process, Governor's Budget and Planning Office, by Luis Vallejo, unpublished Independent Study Project LBJ School of Public Affairs, The University of Texas at Austin, May 1977, pp. 10-18.

a clearinghouse as such, its organization, or the procedure or techniques used in the review process.

GUIDELINES

A-95 implements the review and comment process through the Project Notification and Review System (PNRS). This system is designed in two stages and serves to facilitate coordination of federally assisted projects with state, regional, area and local plans and programs. Coordination is sought through review by state and local governments of applications for federal assistance. The focal point for this review process is a combination of state and areawide clearinghouses.

In the PNRS, a two-step process is followed, the first of which acts as an early warning system which signals that an application is in preparation. When an applicant-to-be decides to seek federal assistance for a project, he sends a "notification of intent" (NOI) to the state and areawide clearinghouses. The NOI is a summary description of the proposed project. The clearinghouse then examines the NOI to determine if there are actual or potential problems with the project in relation to state or areawide plans or programs. The clearinghouse also identifies individual agencies or jurisdictions which might be affected by the proposed project and sends tham a copy of the NOI.

Within 30 days of receiving the NOI, the clearinghouse must indicate to the applicant whether there are any issues raised by the proposal. If there are, arrangements are made for negotiating their resolution, if there are not, the clearinghouse may "sign off." In the latter case, the applicant has fulfilled the obligations and is free to submit the application to the funding agency. If an applicant receives no word, acknowledgement, or response to a NOI within 30 days, it may assume that the clearinghouse will have no comment and proceed accordingly.

The second stage of the process involves a review of the completed application, if issues and problems identified by the clearinghouse have not been resolved. Clearinghouses may have 30 days to review the completed application and supply any comments they may have to the applicant. All comments submitted by the clearinghouse become part of the application and must accompany it when it is sent to the funding agency. These comments are then used in evaluating the application.

In many cases the preparation of an application is very simple and requires little time to develop. In these cases and where no NOI has been submitted, clearinghouses have 60 days to review the application.

In the case of Texas, the Governor's Budget and Planning Office acts as the State Clearinghouse for federal applications under OMB A-95. These applications for federal funds cover a wide range of projects. They can include anything from funding a child development center to funds for a wastewater treatment plant.

When a NOI or completed application is submitted to BPO it is routed from a central dispatch to the section with functional jurisdiction. In specific, an application would be sent to a lead section which would be one of eight sections within BPO: Education, Health and Welfare, Public Protection, Natural Reosurces, Manpower Economic Development and Transportation, General Government and Administrative Service. Each individual section head then assigns the application to a lead person within the section who acts as coordinator for the review and comment process. The lead person is usually a person with expertise or experience with the functional area of the application.

ARTICLE 4413 (32a) - INTERAGENCY PLANNING COUNCILS

BACKGROUND

Article 4413 (32a), Vernon's Texas Civil Statutes, was amended in House Bill 1172 during the Regular Session of the Sixty-Fourth Legislature. The enactment of House Bill 1172 added additional requirements upon the State Clearinghouse, state agencies and institutions beyond those required by the Federal Office of Management and Budget Circular A-95. The philosophy behind the enactment was the perceived need to maximize the use of governmental revenues through planning at state and local levels.

GUIDELINES

Designated as the State Clearinghouse, the Governor's Budget and Planning Office has developed guidelines to address both House Bill 1172 and OMB Circular A-95 requirements. The specific intent of these guidelines is to incorporate the elements required by state and federal law into one simplified reporting and reviewing process. This process emphasizes a "Letter of Intent" procedure.

FEDERAL GRANT OR LOAN APPLICATIONS COVERED BY OMB CIRCULAR A-95

Following BPO guidelines, at least 60 days prior to final submission of an application for federal grant or loan assistance covered by OMB Circular A-95, the applicant agency or institution must submit a "Letter of Intent" to the State Clearinghouse. Regarding state plans covered by OMB A-95, a "Letter of Intent" must be submitted 75 days in advance.

After receiving the "Letter of Intent", the Budget and Planning Office will either decide to review the application, requesting copies of the grant application, or decide not to review. In either case, the applicant will be notified and assigned a State Application Identifier

(SAI) number. The review of an application is conducted within 30 days of receipt of the application or 45 days in the case of state plans.

FEDERAL GRANT OR LOAN APPLICATIONS NOT COVERED BY OMB CIRCULAR A-95 BUT SUBJECT TO REVIEW UNDER H.B. 1172

Applications under this category are processed in a similar manner to the first group. However, in this case, the applicant will be notified only if BPO decides to carry out a review. If a review is deemed unnecessary, no action is taken. In other words, if an application is covered by H.B. 1172, 64th Legislature, the applicant can expect a response from the Budget and Planning Office only if the Office wishes to conduct a full review of the grant application.

In all cases, whether or not a review is conducted by the Budget and Planning Office, if the grant application is approved and the federal grant or loan funds are awarded, the agency or insitution must keep a record of the amount of federal funds granted and forward this and other related information to the Budget and Planning Office on October 1st after the close of the previous fiscal year.

By implementing such a process of notification, the intent of the Budget and Planning Office is to conduct formal reviews on those grant applications that are of state-wide impact and can be strengthened through comments of reviewing agencies. Those applicants receiving no response indicate applications of a technical or specialized nature which, in the opinion of the Budget and Planning Office, would not be significantly enhanced by the review process.